

NOTE

This Microfiche meets the quality requirements of the American National Standard for Microfiche of Documents (ANSI PH5.9-1975). However, because of imperfections in the document from which it was made, it contains images that are illegible or difficult to read. The source document for this microfiche is the best copy that could be obtained prior to filming.

GOVERNMENT FILES: RETENTION OR DESTRUCTION?

HEARING
BEFORE THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
OF THE
COMMITTEE ON THE JUDICIARY
UNITED STATES SENATE
NINETY-SEVENTH CONGRESS
FIRST SESSION
ON
THE REQUEST FROM THE GENERAL SERVICES ADMINISTRATION
THAT CONCURRENCE BE GIVEN TO THE DISPOSAL OF
CIVIL SERVICE COMMISSION PERSONNEL SECURITY INVESTIGATIVE
FILES FOR THE YEARS 1928 TO 1959

OCTOBER 5, 1981

Serial No. J-97-64

Printed for the use of the Committee on the Judiciary



U.S. GOVERNMENT PRINTING OFFICE

89-630 O

WASHINGTON: 1982

5521-42

COMMITTEE ON THE JUDICIARY

STROM THURMOND, South Carolina, *Chairman*

CHARLES McC. MATHIAS, Jr., Maryland
PAUL LAXALT, Nevada
ORRIN G. HATCH, Utah
ROBERT DOLE, Kansas
ALAN K. SIMPSON, Wyoming
JOHN P. EAST, North Carolina
CHARLES E. GRASSLEY, Iowa
JEREMIAH DENTON, Alabama
ARLEN SPECTER, Pennsylvania

JOSEPH R. BIDEN, Jr., Delaware
EDWARD M. KENNEDY, Massachusetts
ROBERT C. BYRD, West Virginia
HOWARD M. METZENBAUM, Ohio
DENNIS DeCONCINI, Arizona
PATRICK J. LEAHY, Vermont
MAX BAUCUS, Montana
HOWELL HEFLIN, Alabama

VINTON DeVANE LIDE, *Chief Counsel*
QUENTIN CROMMELIN, Jr., *Staff Director*

SUBCOMMITTEE ON SECURITY AND TERRORISM

JEREMIAH DENTON, Alabama, *Chairman*

ORRIN G. HATCH, Utah
JOHN P. EAST, North Carolina

JOSEPH R. BIDEN, Jr., Delaware
PATRICK J. LEAHY, Vermont

JOEL S. LISKER, *Chief Counsel and Staff Director*
BERT W. MILLING, Jr., *Counsel*

CONTENTS

OPENING STATEMENT

Denton, Hon. Jeremiah, a U.S. Senator from the State of Alabama.....	Page 1
--	-----------

CHRONOLOGICAL LIST OF WITNESSES

Warner, Robert M., Archivist, accompanied by George Scaboo, Acting Assistant Archivist, and Raymond Mosley, Director, Records Disposition Division, National Archives and Records Service.....	3
Knazik, Joseph R., Chief, Investigations Evaluation Branch, Staffing Services Group, Office of Personnel Management	9
Finzel, Robert P., Assistant Director, Records Management Division, Federal Bureau of Investigation, accompanied by Robert W. Scherrer, Chief, Records System Section, and Thomas B. Dudney, management analyst.....	15
McNamara, Francis M., executive director, Hale Foundation.....	17

ALPHABETICAL LISTING AND SUBMITTED MATERIAL

Finzel, Robert P.: Testimony.....	15
Knazik, Joseph R.: Testimony	9
McNamara, Francis J.: Testimony	17
Prepared statement	22
Memorandum.....	34
Mosley, Raymond: Testimony.....	3
Scaboo, George: Testimony.....	3
Warner, Robert M.: Testimony.....	3

APPENDIX

ADDITIONAL MATERIAL FOR THE RECORD

SUBMISSION OF SENATOR DENTON

"The Erosion of the Federal Employee Security Program: A Critique," by David Martin.....	49
Appendix I—From the Newsletter of the Association of Federal Investigators	138
Appendix II—Cost of Personnel Investigations, by Agency	140

QUESTION-AND-ANSWER SECTION

Agency responses to written questions:	
General Services Administration	144
Office of Personnel Management	470
Federal Bureau of Investigation.....	554

GOVERNMENT FILES: RETENTION OR DESTRUCTION?

MONDAY, OCTOBER 5, 1981

U.S. SENATE,
SUBCOMMITTEE ON SECURITY AND TERRORISM,
COMMITTEE ON THE JUDICIARY,
Washington, D.C.

The subcommittee met, pursuant to call, at 10:15 a.m., in room 6226, Dirksen Senate Office Building, Senator Jeremiah Denton (chairman of the subcommittee) presiding.

OPENING STATEMENT OF SENATOR JEREMIAH DENTON

Senator DENTON. Good morning. This hearing will come to order.

Senator Thurmond's secretary is not aware of whether he will be able to come or not, and has asked me not to delay. He had expressed his specific desire to attend these hearings, since he is involved in the context of it along with former Senator Eastland.

It seems that the subject we are about to address is one which has had periodic investigation by hearings, and the one we have this morning is rather belated with respect to timeliness, and it is hoped that the time we spend here will lead to the resolution of the problem of whether or not the disposal of 20,000 cubic feet of Civil Service Commission personnel investigative files is justified or not.

I have no predisposition either way on this matter. I just want to inquire as a matter of form into this because my review of the correspondence on this indicates that a hearing should be held in order to build a record.

I will have to leave shortly because I am supposed to be at a very crucial MX and B1 hearing at this time. I have requested Mr. Lisker, Chief Counsel, to conduct the questioning in my absence on my behalf.

I have convened the subcommittee this morning to receive and consider testimony and other relevant evidence bearing on a recent request from the General Services Administration to the chairman of the Committee on the Judiciary that his concurrence be given to the immediate disposal of approximately 20,000 cubic feet of Civil Service Commission personnel security investigative files for the years 1928 to 1959 presently being stored at the Washington National Records Center.

This request was referred to the subcommittee for consideration and recommendation. After initial review of the request, and after consultation with representatives from the Archivist Office of the General Services Administration, the Federal Bureau of Investiga-

tion, and the Office of Personnel Management, I thought that it would be helpful and appropriate to have at least one hearing, and perhaps others, in order to fully and openly explore the issues involved prior to making a recommendation that these records be retained or destroyed.

Some of the issues identified in this initial review need further elucidation, such as the exact nature of the records and their contents, whether they have historical or other value, whether they are duplicated by records maintained by any other agency, and whether there are additional reasons for their retention.

As you know, there are Executive orders involved in which certain authorities are charged with the responsibilities for maintaining the security status of individuals who are selected for Government jobs, positions in OPM, and others, and there are criteria which were to have been established, but as yet, we have not seen these criteria in writing. Those are ancillary issues, but they do bear on why we are having this hearing.

Toward this end, the subcommittee will hear testimony from representatives of the agencies previously mentioned and the executive director of the Hale Foundation. I would like to welcome all of the witnesses before we have the first panel from the General Services Administration. We have Mr. Robert M. Warner, Archivist of the United States; Mr. George Scaboo, Acting Assistant Archivist for Federal Records Centers; and Mr. Ray Mosley, Director, Records Disposition Division. From OPM, we have Mr. Joseph R. Knazik, Chief, Investigations Evaluations Branch, Staffing Services Group. From the FBI, Robert P. Finzel, Assistant Director, Records Management Division; Robert W. Scherrer, Chief, Record System Section; and Thomas B. Dudley, Management Analyst. From the private sector, Mr. Francis J. McNamara, executive director, Hale Foundation.

I would ask Mr. Warner, Mr. Scaboo, and Mr. Mosley to come forward. Please remain standing and raise your right hand.

Do you swear that the testimony which you are about to give before this subcommittee will be the truth, the whole truth, and nothing but the truth, so help you God?

Mr. WARNER. I do.

Mr. SCABOO. I do.

Mr. MOSLEY. I do.

Senator DENTON. Please be seated, gentlemen.

I understand, Mr. Warner, that you have an opening statement, which you may summarize or submit for the record.

Mr. WARNER. It is very brief, I might just present it to you because it does touch on the issues that you have raised as to the historical value of the records, and so forth. Then, we will be glad to answer further questions.

Senator DENTON. Thank you very much.

**TESTIMONY OF ROBERT M. WARNER, ARCHIVIST, ACCOMPANIED
BY GEORGE SCABOO, ACTING ASSISTANT ARCHIVIST, AND
RAYMOND MOSLEY, DIRECTOR, RECORDS DISPOSITION DIVI-
SION, NATIONAL ARCHIVES AND RECORDS SERVICE**

Mr. WARNER. Mr. Chairman, I am testifying on behalf of the National Archives and Records Service, which as you have indicated is a component of the General Services Administration, and its Administrator, Mr. Gerald Carmen.

We are pleased to make this brief statement today concerning the interest of the National Archives and Records Service in the disposal of 20,000 cubic feet of personnel security investigative files of the former Civil Service Commission, now the Office of Personnel Management.

These files, covering the years 1928 to 1959, are stored in the Washington National Records Center in Suitland, Md. Disposal of these records was suspended at the request of the Senate Committee on the Judiciary in 1978. As you know, we brought this situation to the attention of the committee in our letter to Senator Thurmond on June 2, 1981. The continued, indefinite retention of these files contributes significantly to the critical space problems facing our records centers, and that certainly is a major concern of the National Archives.

Because we were convinced, for reasons that I will discuss shortly, that the records possessed insufficient historical value to warrant their permanent retention by the National Archives, it appeared that our twin mandates—to identify and preserve the archival records of the U.S. Government, and to encourage efficient maintenance and timely disposition of all other Government records—would best be met by reinstatement of a definite retention period for these files.

In practical terms, the disposal of these records would permit the transfer to the Washington National Records Center of other agency records currently being stored at much higher cost in agency office space.

This 20,000 cubic feet is the first segment in an ongoing series of investigative case files, totaling more than 40,000 cubic feet presently stored at the Suitland Center.

The files contain investigative information regarding an individual's character, conduct, and behavior in the community where he or she lived, and were compiled in order to permit the determination of suitability and fitness for employment with the Federal Government, the government of the District of Columbia, or international organizations.

Investigations also covered access and security clearances, evaluations of qualifications, loyalty to the United States, and evaluations of qualifications and suitability for performance of contractual services for the Federal Government.

These records were originally approved for disposal in 1960. In support of the decision to recommend approval of the request to schedule the records for disposal, the appraisal Archivist stated that other Commission records, including correspondence files, as well as narrative and statistical reports, provided "sufficient information of the Commission's activities and functions in investiga-

tions concerning merit, suitability, and loyalty." In other words, this is the question you raised earlier, Is the information contained in other records in a better form? We are saying that it is. The Archivist also noted, and this also is important, that records of investigations in which the FBI participated, also were maintained by the FBI.

The original retention period was 30 years. Subsequent reductions in the retention period represent OPM's periodic reassessment of their administrative needs for these files and most recently compliance with the Privacy Act constraints on maintenance of information on individuals.

The current retention period is 15 years. Since the legal authority of the National Archives is limited to authorizing destruction of records, establishing and issuing in the General Records Schedules retention periods for records common to most agencies, and identifying records which have archival value, we did not question the retention period requested by the Office of Personnel Management. Indeed, in pursuing our mandate to encourage efficient and economical records management, we encourage agencies to reduce retention periods for records whenever possible.

In preparing for this hearing, members of my staff reexamined portions of these files, looking specifically for cases involving loyalty or other significant matters. The vast majority of the cases they examined, however, documented routine investigations of various persons seeking employment or employed by the Federal Government between 1928 and 1959, to determine suitability for Federal employment or violations of civil service laws or rules and regulations.

The data in these files consisted primarily of basic "common knowledge" information about these individuals, such as name, address, and date of birth.

The records in this 1928 to 1959 segment of the files were arranged for the most part in a straight alphabetical sequence and not marked clearly as to type of case. It was extremely difficult, therefore, to locate significant cases, except where the documentation was so extensive as to have resulted in the file being placed in a separate "oversize" category for convenience's sake. Most of these "oversize" files appeared to concern loyalty investigations, but consisted primarily of copies of documents compiled and used by the FBI during their portion of the investigation.

Thus to the two factors bearing on the original appraisal—that (1) the personnel security program was adequately documented in the Commission's administrative records, which are being saved; and (2) a more compact collection of comparable case files documenting the more substantive investigations was maintained by the FBI—might be added the following considerations:

(a) The records are arranged in a manner that does not permit easy identification or segregation of case files with potential research value;

(b) Screening the entire collection for the significant case files would impose an intolerable burden on the OPM and NARS, especially in these times of fiscal restraint; and

(c) Access to the files would be restricted for 75 years under NARS General Restrictions, which are based on the Freedom of Information Act, as amended, and the Privacy Act.

However, because of the sensitive nature of the documents, and the potential national security ramifications, I believe that OPM should work with Archives to make certain that there are no national security implications before disposal.

I will submit a chronology¹ which identifies from 1960 those events involving the activities and decisions of the National Archives. If the subcommittee wishes copies of any of the approved requests for records disposition authority identified in the chronology, I will be pleased to provide them.

That concludes my statement, Mr. Chairman. We are prepared to answer questions.

Senator DENTON. Thank you very much, Mr. Warner.

Our responsibility is to ascertain practically whether there are considerations requiring continued storage which might override those of the space consideration. How are these files stored; are they in boxes, crates, filing cabinets, or what?

Mr. WARNER. We have actually examined these files, and I might turn to a member of my staff who, just before this hearing, examined them himself, and let him respond to that.

Mr. Mosley, do you want to talk of the actual format of those files?

Senator DENTON. Just roughly, what sort of storage containers are they in?

Mr. MOSLEY. Cardboard boxes, standard record center cartons.

Senator DENTON. Twenty thousand cubic feet sounds like a vast amount of space, and I am trying to get that in my mind in terms of this room. Wouldn't 30 by 30 by 30 be 27,000 cubic feet, which is 7,000 cubic feet more than what you are talking about?

Mr. MOSLEY. Yes.

Senator DENTON. So it might be less than a quarter the size of this room, we are talking about.

Mr. MOSLEY. Yes, sir.

Senator DENTON. What percentage of the total volume of records which GSA maintains in storage would that volume represent, roughly.

Mr. WARNER. A very small part.

Mr. SCABOO.

Mr. SCABOO. I am not sure of the percentage, but we hold 14 million cubic feet at the present time in 15 records centers across the country.

Senator DENTON. How many million was that please, sir?

Mr. SCABOO. It was 14 million.

Mr. WARNER. The space problem, I guess we should interject, is becoming more difficult every day.

Senator DENTON. I understand that every little bit helps. One seven-hundredth is what we are talking about here. I just did it myself, 20,000 over 14 million, one seven-hundredth.

How much do you keep at the Suitland facility?

¹ The chronology was subsequently submitted and can be found in the appendix, p. 148.

Mr. SCABOO. We have about 2.9 million cubic feet at Suitland today, if I remember the figures correctly.

Senator DENTON. You from the Archives have indicated that there is insufficient historical value to warrant further permanent retention. If that point is valid, certainly we would agree with their destruction.

How are you defining or connoting the term "historical value"? What qualities must a document or series of documents possess in order to meet your definition of "historical value"?

Mr. WARNER. That is a very good question. This is the basis of the archival profession, and I will let my colleagues speak more precisely to it. But you have with these records, like you have for any records, probably any record that is created, some historical value. You can make a case that any piece of paper, any document probably has some historical value.

What you are up against ultimately is to balance that with the needs of space and maintenance, to be sure that it is a rich enough document to insure that it is preserved and saved permanently, because it costs time, money, and effort, and so forth, to preserve records.

Certain records are very easy to determine their historical significance. Documents of great national significance, the Declaration of Independence, or the papers of the First Continental Congress, or the records of the Executive Office of the President, those are very easy. But from that point on, we go through a systematic procedure using skilled and trained archivists, who have historical and archival training. They examine the records for the qualities that may make them of permanent significance, and they make their judgment.

Mr. Scaboo, or Mr. Mosley, do you want to add to that?

Mr. MOSLEY. The only point that I would add is that the program or administrative records of the Civil Service Commission also document the investigative program, and because they represented a comprehensive collection of records that document the activities of the Commission, we felt that that was the appropriate collection of records to keep to document those activities.

Senator DENTON. Who also documents it? I missed the organization.

Mr. WARNER. That is an important point.

Mr. MOSLEY. The program records of the Civil Service Commission, or of the Office of Personnel Management.

Mr. WARNER. They are being saved.

Senator DENTON. Do you mean those records duplicate these?

Mr. MOSLEY. These are not exact duplicates, no, sir. They are the records which identify the policies and practices of the Civil Service Commission.

Mr. WARNER. This goes back to your criteria of which record is most useful for the historical purpose. These records that he is describing, we regard as permanently, historically significant, and they will be saved. In other words, they are of higher value from the standpoint of history.

Senator DENTON. How did you select the files that were reviewed? I would also like to know who on the staff examined the records, and some specific idea of what sample of those records nu-

merically were reviewed in order to arrive at the conclusion that there was no historical value attached to what was contained in the files.

Mr. WARNER. Mr. Mosley did the examining with people on his staff. I will let him respond to that.

Mr. MOSLEY. I personally examined the records as did Debra Leahy of my staff. We do not know what sample was made in 1960 when the initial schedule was approved. We did not make a scientific sampling in our reexamination. We looked randomly at files. I certainly looked at maybe 20 to 25. She, I am sure, looked at as many, and perhaps more since she went out a time or two in addition to the time that I went out.

Senator DENTON. What did you find in the files?

Mr. MOSLEY. In the files were, of course, for the most part the routine investigative documents, for example, the form that the employee or potential employee must fill out, and the results of the review of the information provided in that file.

In the loyalty files that we looked at, the documentation, of course, was much more extensive. It included not only the basic information that was in the routine investigative file, but also the results of discussions with people who knew the employee or prospective employee, in some cases, hearings before loyalty boards, transcripts of those hearings, correspondence relating to the investigation, as I mentioned, more extensive than in the routine files.

I might add, sir, that the records that we looked at do contain a collection of oversize records that Dr. Warner mentioned earlier. These were placed at the end of this 20,000 cubic feet collection and, for the most part, those dealt with the loyalty question and related matters.

Mr. WARNER. You might mention that some of the files you found were FBI reports, and so forth, in those files. Is that correct?

Mr. MOSLEY. That is right. We did find those which appeared to be copies, and based on our review of the previous documentation in the case relating to the approval or disposal, we would conclude that the FBI does have the original copies of those records.

Senator DENTON. We will be asking the FBI about their propensity for producing and identifying these records to which you refer.

Twenty thousand cubic feet—someone has estimated the number of files involved and came up with a number of approximately 2 million, and you say that you and the lady looked at 20 to 25 apiece.

For what it is worth, samplers who have been involved in that sort of determination in the past to ascertain the nature of records and categorize them, said that at least a 5-percent sample would be required to have a sufficient sample; namely, 100,000 files. That would be the assumption from which I am proceeding. The most you claim to have examined is 50, and the 100,000 is the thing that is being presented as necessary. How do you respond to that?

Mr. MOSLEY. Sir, we were not trying to do a full-scale evaluation in examining the files. We wanted to confirm information that was in the disposal dossier that we maintain in our office. Certainly, two of us could not look at that number of files to do a scientific sampling. It was merely to gather information and confirm the in-

formation that was already contained in our disposal dossier in our office.

Senator DENTON. The obvious question arises as to the validity of the conclusion that they are not of historical value if we begin with the fact that we looked at only much less than a scientific sample to ascertain this. How much subjective reasoning one applies is interesting, but not particularly determinative.

If we have looked at 50 out of millions, I am not sure we have an adequate base upon which to make the conclusion that they are not of historical significance, and I would have to mention that in passing.

Mr. WARNER. I think one thing we need to make clear. This was not a reappraisal. The records, as I understand, were originally scheduled for disposition in 1960, and there no doubt was investigation and study at that particular time.

Senator DENTON. There is no doubt, but there is no doubt either way. I have no idea of whether they looked at 10, or the 100,000.

Mr. WARNER. Sure.

Senator DENTON. My review of the previous hearing indicates that there was no information about how much sampling was done. That is one of the reasons we are looking at this.

So in selecting the files, you have said that it was a random method of pulling them out.

In your opening statement, sir, you indicated that the files consist primarily of investigative material regarding the character, conduct, and behavior of individuals in the community in which they live, and that they were compiled in order to permit the determination of suitability and fitness for employment with various agencies of the Federal Government.

My question is, Were other files compiled on the various organizations of a subversive character which existed during the pertinent period of investigation and, if so, are those files part of the files which are the subject matter of this hearing?

In other words, are we talking about files on individuals, or are we talking about files on individuals and organizations?

Mr. WARNER. Sir, I think that the files exclusively relate to individuals and not to organizations. I think we have to keep in mind the dates here. Many of the files are now over 50 years old, and the most recent ones are at least 22 years old. So they were mostly created in a much more tranquil era than now, in the 1920's and 1930's, and that, I think, casts a little different light as far as historical usefulness is concerned, as well.

Maybe more recent files would be of some difference, I don't know.

Mr. SCABOO. I might add, Mr. Chairman, that these are files on individuals, as opposed to organizations that you mentioned.

Senator DENTON. There are no files on organizations in these in question?

Mr. SCABOO. In the group of records there, no, sir. It is on individuals, and not on organizations.

Senator DENTON. We are going to try to use commonsense in arriving at whether or not we should continue to stuff the Archives with this kind of thing, but as you know in applying what amounts

to commonsense in the rulesetting bodies, we have come a long way from what we originally regarded as commonsense.

We used to talk about a minimum 30 years retention, as you know. Some would hold that the Privacy Act emasculated the capacity for determining an individual's previous background in these terms when it was passed. In 1974, you could not ask an individual whether he belonged to the Communist Party. You could not ask an associate of his whether he did.

The fact that the individual being investigated could now look into files and find out what information there was on him, led to the intimidation of those who would otherwise testify because the information which they would have given on the applicant, if harmful to the applicant, could lead to their assassination, among other things.

I am giving you some idea of my present orientation on this. As an old Navy person, who had classified material to store once for an entire task group, I know the kind of chaos that can exist in this area, and you are called up here and you probably have no idea of what happened before.

So I am not trying to put you on the carpet for that, but I am trying to ascertain if there may be a step here which is a wrong direction that has already proceeded too far, which is no fault of yours at all. I just want to make sure that we are not taking such a step, if we destroy these files.

Mr. WARNER. I understand that very well and appreciate the point.

Senator DENTON. Thank you very much, gentlemen, for your testimony. We may well submit written questions for you to answer later.

Mr. WARNER. We will be very happy to respond.

Senator DENTON. Thank for your cooperation.

I will ask the other witnesses, since I must depart and I am 45 minutes late for the other hearing, to step forward and be sworn, and then Mr. Lisker will do the questioning of the witnesses starting with Mr. Knazik.

Mr. Knazik, Mr. Finzel, Mr. Scherrer, Mr. Dudley, and Mr. McNamara, would you come forward please. Would you raise your right hand, gentlemen.

Do you swear that the testimony which you are about to give before this subcommittee will be the truth, the whole truth, and nothing but the truth, so help you God?

[Chorus of "I do."]

Senator DENTON. If Mr. Knazik will take the witness chair. I will have to depart, and turn over the hearing into the most capable hands of Mr. Joel Lisker.

Mr. LISKER. Mr. Knazik, do you have an opening statement?

**TESTIMONY OF JOSEPH R. KNAZIK, CHIEF, INVESTIGATIONS
EVALUATION BRANCH, STAFFING SERVICES GROUP, OFFICE
OF PERSONNEL MANAGEMENT**

Mr. KNAZIK. Yes, I do, and I would like to read it if I may.

We appreciate this opportunity to discuss the proposed disposal of the OPM's personnel security investigation files for the years 1928 to 1959.

By way of introduction, I am the Chief of the Investigations Evaluation Branch in the OPM's Division of Personnel Investigations. The Investigations Evaluation Branch has responsibility for retention and release of the OPM's personnel security investigations files, adjudicating the suitability of applicants for employment in the Federal competitive service, and conducting appraisals of Federal agency personnel security programs.

The files in question were compiled in connection with personnel security investigations conducted by the OPM for the purpose of determining suitability or fitness for Federal employment, employment in the government of the District of Columbia, and international organizations, also for access and security clearances, evaluations of qualifications for Federal employment, determinations of loyalty to the United States, and evaluations of qualifications and fitness to perform contractual services for the U.S. Government.

There are approximately 2 million files occupying 20,000 cubic feet of space at the Washington National Record Center. These files were originally scheduled for disposal after 30 years under the provisions of a previous disposal schedule. In 1975, the schedule was reduced to 20 years. The most recent schedule provided for a 15-year disposal.

Each file contains investigative information concerning an individual's character, conduct, and behavior that was obtained during the course of an OPM-conducted personnel security investigation from personal sources in the communities where the individual lived and worked, and through checks of records at those locations.

The information consists of typed reports of personal interviews and record checks. Such information served as a basis for making the evaluations I previously mentioned. Sources of the information contained in the file basically include:

- FBI record sources.

- House Committee on Internal Security records. These files are now nonexistent.

- Civil Service Commission files.

- Military and naval investigative and intelligence agencies.

- Files of other Federal investigative and intelligence agencies.

- State and local law enforcement agency files.

- Employers, supervisors and employment records.

- Educational records and personal testimonies.

- References listed on the application or otherwise developed.

- Credit sources.

- Neighborhood sources.

Each of the 2 million files represents an investigation conducted under one of a variety of security and suitability programs during the period of 1928 to 1959. OPM personnel investigations originated as a means of obtaining information for enforcing the Civil Service Act of 1883. Prior to 1939, these investigations were limited essentially to questions of general suitability.

The Hatch Act of 1939 provided the basis for the first national security investigations. During World War II the former Civil Serv-

ice Commission conducted personnel security investigations under the Hatch Act and War Service Regulation II.

A Federal loyalty program was established in 1947 by Executive Order 9835 under which the former Commission conducted personnel security investigations until Executive Order 9835 was replaced by Executive Order 10450 in 1953.

In addition to the investigations on persons being considered for Federal employment, the former Commission began conducting investigations on contractor personnel at the Atomic Energy Commission in 1952 under the Atomic Energy Act.

Since 1939, all information indicating a possible question of loyalty developed during the course of an OPM-conducted investigation has been referred by the OPM to the FBI for a full field loyalty investigation. It is our understanding that the FBI is prohibited from any file destruction because of an injunction by the American Friends Service Committee.

The index of the files at the Washington National Records Center was placed in storage in 1975. The files currently are not being furnished to agencies or individuals for any purpose.

I will attempt to answer any questions which you may have.

Mr. LISKER. Thank you, Mr. Knazik.

Mr. Knazik, how long have you served as Chief of the Investigations Evaluation Branch at OPM?

Mr. KNAZIK. Since May 1980.

Mr. LISKER. So your experience in this area is fairly recent?

Mr. KNAZIK. Yes, sir.

Mr. LISKER. How long has that office had responsibility for the implementation of Executive Order 10450?

Mr. KNAZIK. The office was created at that time, Mr. Lisker. There was a reorganization. The Operations Division, in which I was previously associated as the Security Appraisal Officer, had the responsibility for the files prior to that time.

Mr. LISKER. Who was your predecessor in office?

Mr. KNAZIK. Arthur Willis, in the Operations Division, at that time.

Mr. LISKER. And Chief of Investigations, your predecessor in your present position?

Mr. KNAZIK. I am the first one in that position. When we reorganized, we took Adjudications and Operations, they were divisions at that time, and we reorganized them and combined them into the Investigations Evaluation Branch, and I am the first chief of that branch.

Mr. LISKER. In your statement you refer to the index to the files which was placed in storage in 1975. Can you describe the index for the subcommittee, and describe the information that it contains?

Mr. KNAZIK. The index is an extensive index of 4 by 6 file cards, which are the cards that we use when we are initiating a case. It contains identifying information, including the person's name or names, date of birth, social security number.

There is usually a little further information with an address, and some information about why we are conducting an investigation, and what kind of investigation it is. When I say, why, I mean which agency, in other words, it may say, clerk-typist for the Securities and Exchange Commission, or something like that.

There will also be a file number if the case eventually warranted making an investigative jacket, and retaining a file.

Mr. LISKER. What kinds of investigations are there? You mentioned that it contained some description of the kind of investigation, what categories of investigations?

Mr. KNAZIK. In general there is the background investigation or full field investigation, which is a personally conducted investigation. Then we have the national agency check and inquiry investigation, which is a paper investigation, where we send vouchers to former employers, places of education, and police departments, and references. Those are the two basic types of investigations.

The N.A.C. & I. investigation may sometimes be expanded, depending on what kind of information is developed, if we feel that there might be some merit to going out personally.

Mr. LISKER. The index to which you referred, and which I asked you about, since it is on 4 by 6 file cards, would have been updated over the years, is that correct?

Mr. KNAZIK. It is continually being added to, yes.

Mr. LISKER. So that the index could very well contain file cards which were prepared roughly about the time the index was sent to the storage facility; is that correct?

Mr. KNAZIK. I am sorry, I don't understand.

Mr. LISKER. My question is, Is every index card contained in the index eligible for destruction under the present schedule?

Mr. KNAZIK. No. The index is cumulative, and it is not by year. It is strictly an alphabetical listing.

Mr. LISKER. Would it be fair to say that to the best of your knowledge there are no plans to destroy the index itself?

Mr. KNAZIK. Yes, there are no plans to destroy the index.

Mr. LISKER. I think we have had the question answered, but I think I would like to hear it from you. To the best of your knowledge, do the files now stored at the Suitland facility contain any organizational files?

Mr. KNAZIK. The files that are at Suitland are files that are indexed by name of individuals. In those files there may be information regarding organizational activities of the individual, however it is not indexed that way at all. There is no way to retrieve that.

Mr. LISKER. Did the Civil Service Commission, now OPM, maintain organizational files?

Mr. KNAZIK. That was a separate set of files, yes, sir.

Mr. LISKER. Where are they?

Mr. KNAZIK. Those are in a warehouse in Alexandria.

Mr. LISKER. Is that a GSA controlled warehouse?

Mr. KNAZIK. I have no idea. I don't believe so.

Mr. LISKER. Mr. Warner, do you know?

Mr. WARNER. They are not in at the National Archives facility.

Mr. LISKER. Could you ascertain under whose control that warehouse is, so that we would know?

Mr. KNAZIK. I can let you know, yes.

[The following was subsequently submitted for the record:]

The organizational files are stored in cartons in OPM leased space at the Alexandria Distribution Center located on Pickett Street. In addition, there are approximately 30 boxes of public source documents under lock and key in the building in which I work—1717 H Street, NW.

Mr. LISKER. And whether or not those files are in any way slated for some final action.

Mr. KNAZIK. Those are not. They were the subject of a discussion before this committee previously, I believe, in 1978.

Mr. LISKER. So that if a file was compiled on a subversive organization, which began in the 1920's, that would be outside the period.

Mr. KNAZIK. No one has discussed destruction of those files.

Mr. LISKER. Thank you.

Does OPM maintain other files in this category which have not been placed in storage, that is, on individuals?

Mr. KNAZIK. I guess I really don't understand what you are asking, except that we do maintain in-house some files that are the most recent before they go to storage in Suitland.

Mr. LISKER. We have 40,000 cubic feet of files, 20,000 cubic feet of which are slated for destruction. In addition to those 40,000 feet of files, does OPM presently store somewhere else other files gathered under the 10450 program?

Mr. KNAZIK. Other than a very small amount of files that are currently being processed, and which we keep at our place of business in the District, but those are periodically boxed and sent to Suitland, and it is a temporary housing situation, there are no others anywhere else.

Mr. LISKER. What would you suggest as an adequate sampling to insure the proper coverage of the records? For example, Senator Denton mentioned earlier that a 5-percent figure would represent a scientific sampling. Do you have any views on that?

Mr. KNAZIK. I don't have any view on it. I am not a statistician, and I am not up on sampling techniques.

Mr. LISKER. In your prepared statement you did not set out OPM's position on the disposal or retention of the records. Does OPM have a position?

Mr. KNAZIK. We have not discussed this with our new Director, no. At this time we are unable to answer that.

Mr. LISKER. Would you, at some time in the near future, make it a point to bring this up for discussion, so that we could get an agency position on the issue?

Mr. KNAZIK. Yes, sir.

Mr. LISKER. Are you personally aware of the information which is contained in the files?

Mr. KNAZIK. I think, generally, yes.

Mr. LISKER. Has OPM, at any time, surveyed the content of the files to ascertain what was contained therein?

Mr. KNAZIK. Periodically, the files would come up as we were doing a subsequent case, so we would see some of the old files, that would be one of the ways. Also, prior to our removal of the index in 1975, and after 1975 for some time, we would pull some of the old files if people requested their file under the Privacy Act. We would have an opportunity in this peripheral way to see them, but we had no systematic method of retrieving just to look at them.

Mr. LISKER. If the chairman of the Judiciary Committee concurs with the request that has been made by GSA, by the Archivist's Office, what effect will this have on requests by individuals under the Privacy Act to obtain the information contained in their CSC files?

Mr. KNAZIK. Since we have removed the index, we don't furnish the file under any circumstance. So there would be no change from what we are doing at present.

Mr. LISKER. Is the activity which gave rise to the creation of these files still conducted by OPM? That is, is there a 10450 program at OPM?

Mr. KNAZIK. There is a 10450 program, yes.

Mr. LISKER. How many people are involved in that program?

Mr. KNAZIK. In the OPM?

Mr. LISKER. Yes, sir.

Mr. KNAZIK. Our investigative staff runs around—I really don't know. It may be around 800, but I am not sure, though.

Mr. LISKER. There are 800 people at OPM involved in the 10450 program?

Mr. KNAZIK. All of our investigative staff, almost all of them are involved in the 10450 program, yes.

Mr. LISKER. Is this basically National Agency checks, or what?

Mr. KNAZIK. It includes our field investigators in the 10 regions and Washington. We have also delegated to certain agencies the conducting of investigations under 10450, such as the Departments of State, Treasury, and Justice.

Mr. LISKER. To conduct 10450 investigations for their own employees, or prospective employees?

Mr. KNAZIK. Yes.

Mr. LISKER. Is there any standardization of techniques used? Do these agencies conduct the same type of investigations, or are they pretty much left to their own design?

Mr. KNAZIK. We publish in the Federal Personnel Manual guidelines for the conduct of investigations that goes a little more in depth than 10450. The agencies follow those guidelines generally.

I left out the Defense Department, the largest conductor of investigations.

Mr. LISKER. The organizational files which CSC maintained are in a warehouse?

Mr. KNAZIK. Yes, sir.

Mr. LISKER. If an allegation comes in that an individual was a member of a group which is a violence prone organization, how do you develop additional background information on the group if you don't have the organizational file?

Mr. KNAZIK. We refer the case to the Federal Bureau of Investigation. Whenever we receive an allegation of disloyalty on the part of an individual, our instruction to our investigators is to immediately discontinue the investigation, and we refer to the FBI for their full field investigation.

Mr. LISKER. Does the FBI conduct such an investigation?

Mr. KNAZIK. In recent years, the FBI has conducted less and less of those investigations since the Attorney General's guidelines in 1976.

Mr. LISKER. I am not sure I understand. If you develop this information which suggests membership in a violence-prone organization, and you refer it to the FBI for investigation, what assurances do you have that the FBI will conduct the investigation, or if the FBI declines to conduct the investigation because of its own guidelines, what action is taken to resolve the information?

Mr. KNAZIK. If they don't conduct an investigation, then they return the case to us and we will complete it as best we can, getting as much information as we can, which will probably include some characterization of the organization.

Mr. LISKER. I guess my question is: From what source do you derive the characterization of the organization, if you don't have the file concerning the organization?

Mr. KNAZIK. The people who supply us with the information in the first place will probably be the ones who would tell us, the police department, or whatever.

Mr. LISKER. What if the information comes from a reference, or a former employer?

Mr. KNAZIK. We accept the information from wherever we get it. We act as a conduit. We collect the information and pass it on to the using agency.

Mr. LISKER. I have no further questions, Mr. Knazik. I think the same as Senator Denton has said to Mr. Warner, and the gentlemen accompanying him, we may have additional questions for you. I think Senator Biden will probably have some questions for the first set of witnesses, so I think you should anticipate getting questions and furnishing written responses.

Mr. KNAZIK. Fine.

Mr. LISKER. Thank you very much, sir.

Mr. KNAZIK. Thank you.

Mr. LISKER. Mr. Finzel, Mr. Scherrer, and Mr. Dudley. You gentlemen have been previously sworn by Senator Denton.

Mr. Finzel, we have heard some testimony here today that many of the files previously maintained by the Civil Service Commission which relate to investigations of loyalty and subversive activities are duplicated in files maintained by the FBI. How would you respond to this representation?

TESTIMONY OF ROBERT P. FINZEL, ASSISTANT DIRECTOR, RECORDS MANAGEMENT DIVISION, FEDERAL BUREAU OF INVESTIGATION, ACCOMPANIED BY ROBERT W. SCHERRER, CHIEF, RECORDS SYSTEM SECTION, AND THOMAS B. DUDNEY, MANAGEMENT ANALYST

Mr. FINZEL. Where the FBI has conducted background investigations, or has been asked to conduct them, it would have a record in a headquarters file. There has been no destruction of applicant background or security of Government employee type investigations. As far as records are concerned, there has been no destruction at FBI headquarters.

We have an acute space problem shared by other agencies, and some of our field records up until January 1980 were in the process of a destruction program approved by headquarters. Since then, we have been enjoined by the Federal district court from destroying any field or headquarters records.

Our headquarters records have not been destroyed. Information based on any FBI background investigation would be in headquarters records.

Mr. LISKER. So I guess the \$64 question is, How many of these 2 million files were referred to the FBI for further investigation?

Mr. FINZEL. I noted that Mr. Knazik indicated that since 1939 all information indicating a possible question of loyalty developed during the course of an OPM conducted investigation has been referred to the FBI.

I cannot attest to the accuracy of that. If it is accurate, and I have no reason to doubt it based on his statement, then we would possess that information.

Mr. LISKER. Would the Civil Service Commission organizational files, which Mr. Knazik says now rest in another warehouse, be more complete than those maintained by the FBI, keeping in mind that the Levi guidelines may have curtailed somewhat the accumulation of material on certain organizations.

Mr. FINZEL. To the extent that it might contain materials subsequent—I rather doubt that it does contain materials subsequent to the imposition of the Levi guidelines. But any investigation that the FBI conducted on organizations dating back to the 1920's, up until the imposition of the Levi guidelines in 1976, I believe, those organizational investigations are present in the FBI files. That would include all the organizations under the old Attorney General's list of subversive organizations plus others, which were violent prone, or committed acts of violence.

Mr. LISKER. From your experience, would you say that the sources of information which went into making up or contributed to the FBI organizational files would be more complete than those maintained by the Civil Service Commission, or represent a broader spectrum or variety of sources?

Mr. FINZEL. It would be difficult for me to say. We might have had more extensive sources than OPM in view of the fact that theirs were basically applicant-type investigations. We were conducting not just background investigations on applicants, but a broad scope of internal security and Communist infiltration-type investigations in the 1940's, 1950's, and 1960's.

Mr. LISKER. I think you may have responded to this question in part. Does the FBI maintain current files on organizations previously designated as subversive by either the Attorney General or the SACB, the Subversive Activities Control Board?

Mr. FINZEL. The files are maintained. There are no investigations being conducted and the files, therefore, would not be updated unless the organization is under investigation and falls within the current guidelines of the Attorney General.

Mr. LISKER. If the FBI were requested to participate in a scientific sampling of the files now stored in the GSA Suitland facility, in your view, would the Bureau be receptive to such a request?

Mr. FINZEL. I really am not qualified to give an opinion on that. I am not acquainted with any history of the FBI having conducted a scientific sampling or statistical analysis of that nature, therefore, I am reluctant to respond in a definitive way. I am aware that the General Accounting Office and, of course, the Archives in historical matters are more equipped to do that.

Mr. LISKER. It is possible that what might be proposed is a mini task force made up of FBI, GAO, and GSA personnel, so that once and for all we can go through these files, or at least a satisfactory sampling of the files, and ascertain whether or not material in these files is duplicated in FBI files.

It does not appear that we know the answer to that question, nor does it appear that anyone else does either. But I think this is something that probably will have to be done in order to, at least with some certainty, make this determination.

Mr. FINZEL. If the Senate were to propose such a plan, I would suggest they send that to the Attorney General in writing.

Mr. LISKER. I am sure we will.

One of the areas that is very interesting to me personally, and I think to Senator Denton, is the so-called historical considerations.

If an individual applied for a position of responsibility and trust with the Government, and he was turned down because information indicating prior subversive activities was developed, then, that individual later achieved national or international recognition by virtue of some meritorious accomplishment, would you deem it relevant that the file should be maintained so that researchers, perhaps 75 years from now, would have the benefit of that information dealing with a facet of that person's life which was heretofore unknown?

Mr. FINZEL. May I ask you, did you say meritorious or notorious?

Mr. LISKER. The second would have been meritorious, and the first perhaps notorious.

An individual who, for example, was a member of the Socialist Workers Party and was for that reason prevented from obtaining Government employment, later became a famous writer, or went into politics and established a very positive name for himself.

My question is, Is the type of information about the individual's past, which is more or less derogatory or could be construed that way, important to researchers or should it be; if so, what will happen if the information is destroyed?

Mr. FINZEL. I, of course, would give you an opinion not as a records manager, but as an amateur historian, and I would think that it would be of historical interest, but I would defer to Dr. Warner on matters of that nature.

Mr. LISKER. I have no further questions. Again, I think it is possible that Senator Denton, when we have an opportunity to talk about this further, may have additional questions which he will furnish to you in writing, and we would appreciate having your responses.

I want to thank you for your appearance here today.

Mr. FINZEL. Thank you.

Mr. LISKER. Mr. Francis J. McNamara.

Good morning, Mr. McNamara.

Mr. McNAMARA. Good morning.

Mr. LISKER. Do you have an opening statement?

Mr. McNAMARA. Yes, I do. Would you prefer that I read it, or summarize it?

Mr. LISKER. Whichever you find most suitable for your own purpose.

TESTIMONY OF FRANCIS J. McNAMARA, EXECUTIVE DIRECTOR, HALE FOUNDATION

Mr. McNAMARA. I will summarize the statement, and submit it for the record.

Basically, the position of the Hale Foundation is that these records should not be destroyed. Insofar as they have any present-day utility in the security program, they should be returned to the Office of Personnel Management, and there put to effective use in the personnel security program for the simple reason that you cannot have an effective program in any area of security or intelligence without an adequate data base. This is essential in all human activity.

Files are recognized everywhere as vital in all operations. Whether it is a housewife with a file of her favorite recipes or anything else, you just cannot do without them.

It is very obvious that the Office of Personnel Management has to store a tremendous amount of information if it is going to do its job effectively. It needs intelligence. I know the question of intelligence files has been very controversial in recent years. It is claimed, in a lot of cases, that they are not needed. At other times, it is said that they violate individual rights.

I would like to point out that 5 years ago or so I testified before the predecessor of this committee, and prior to doing so I had reviewed the findings of every presidential and national commission that had looked into problems of security and crime for the preceding 12 years. Every one of those commissions agreed unanimously that there was a great need for intelligence, a data base of information for any agency, for all units of the Government, operating in these areas.

These were the President's Commission on the Assassination of President John F. Kennedy, which issued its report in 1964; the President's Commission on Crime in the District of Columbia in 1966; the President's Commission on Law Enforcement and Administration of Justice in 1967; National Advisory Commission on Civil Disorders in 1968; the National Commission on the Causes and Prevention of Violence in 1969; the President's Commission on Campus Unrest in 1970; and the National Advisory Commission on Criminal Justice Standards and Goals in 1973.

Significantly, every one of these Commissions found the U.S. deficient when it came to the intelligence necessary to cope with the problems they dealt with, and urged that intelligence collection activities be stepped up.

These bodies, I might mention, represented almost 9 years of concentrated study by hundreds of highly qualified people. The members of the commissions were all prominent in one phase or another of American life, and the same was true for the most part of their staffs and the scores of consultants who worked with them. They represented every major intellectual discipline that was at all relevant to the subjects they were investigating—historians, sociologists, lawyers, prosecutors, doctors, clergymen, psychologists, professional law enforcement personnel, and representatives of all branches of government.

In my view, their unanimous finding on the need for more and improved intelligence, over and above the concept of the basic general necessity of intelligence, completely destroys the claims that have been made recently in the way of criticism of intelligence collection activities on the Federal, State, and local level.

There are four basic steps in intelligence. First, collection of information, then storage, then analysis, and dissemination.

Files are the essential knowledge retention step, the stored memory of information developed. Because security related knowledge is normally so extensive and minutely detailed that it is far beyond the memory of any individual or group, there can be no adequate intelligence in any area, including personnel security, without extensive files.

Does the collection of data for such files violate individual rights? The Supreme Court has said no, and since its 1972 decision on this subject in *Laird v. Tatum*, numerous other courts, keying their decision to that decision, have said the same thing.

The basic facts in the case are as follows: During the riotous 1960's, local and State police found themselves incapable of controlling rampant violence. It was beyond their ability, and their numbers. As a result, millions of dollars worth of property was destroyed, thousands of American citizens were injured, and many killed. The physical wreckage of that period can still be seen here in Washington and other cities.

President Johnson assigned the Army riot control duties, and the Army, correctly and intelligently, decided that it had to collect civil disturbance-related intelligence to carry out those duties.

Its collection was widespread and extensive, as it should have been because the Army could never tell just where and when, and under what circumstances, its specially trained forces might be called upon to put down massive, otherwise uncontrollable violence that threatened life and property. Its files, like those of the Civil Service Commission and OPM, by the way, were based largely on public source information, newspapers, magazines, and so on.

Mr. LISKER. Mr. McNamara, there is a small microphone on the table in front of you.

Mr. McNAMARA. Is it coming through all right?

Mr. LISKER. Yes, but it sounds as though you are suffering from the same thing I am, and I thought it might be more comfortable for you.

Mr. McNAMARA. Thank you.

One Arlo Tatum and others on whom the Army had assembled information sued, claiming violation of their rights under the first, fourth, fifth, and ninth amendments, and their right of privacy. They asked for a finding that the intelligence collection was unconstitutional and illegal, a ban on its continuation, and the destruction of all information collected in the program.

The trial court denied their claims, stating:

The court holds that what in effect the plaintiffs are complaining of here is that the Army is keeping the type of information that is available to all news media in this country, covered by all news media in this country, and which is in the morgues—that is the files—of the newspapers in this country and magazines, and the Court holds that they state no cause of action; they show no unconstitutional action on the part of the Army; they show no threats to their rights.

This decision was reversed by the court of appeals, and the Government then took the case to the Supreme Court, which reversed the court of appeals and upheld the original district court finding. It pointed out that the military was not concerned with law enforcement as such and had power to act against people on its own,

and in that sense was a greater threat to civil rights or liberties than a civilian investigative agency, such as the FBI or local police force. In spite of this, the Supreme Court ruled:

In performing this type function the Army is essentially a police force or the back-up of a local police force. To quell disturbances or to prevent further disturbances the Army needs the same tools and, most importantly, the same information to which local police forces have access. Since the Army is sent into territory almost invariably unfamiliar to most soldiers and their commanders, their need for information is likely to be greater than that of the hometown policeman.

No logical argument can be made for compelling the military to use "blind" force—that blind was the emphasis of the Court. When force is employed it should be intelligently directed, and this depends on having reliable information—in time * * *. As Chief Justice John Marshall said of Washington, "A general must be governed by his intelligence and must regulate his measures by his information * * *." So we take it as undeniable that the military, that is the Army, need a certain amount of information in order to perform their constitutional and statutory missions * * *.

The case was dismissed; no cause for complaint. The court found no violation of any constitutional right. The Army's collection of intelligence for a legitimate purpose was proper and completely legal.

Obviously, the Civil Service Commission's collection of the intelligence at issue here in these hearings was for a legitimate and constitutional purpose—the preservation of the national security and the integrity of the Federal Civil Service.

President Truman placed a tremendous intelligence burden on the Civil Service Commission, predecessor of the Office of Personnel Management, when he issued Executive Order 9835 in 1947, instituting the Government's present personnel loyalty-security program. He made the Commission responsible for investigation of the loyalty of all current employees of agencies and departments that did not have investigative services of their own, and all new entrants into the competitive service.

He intelligently directed the Commission to establish and maintain a central master index of all persons investigated for loyalty by any agency or department since September 1, 1939, along with adequate identifying information about such people.

He further directed that all loyalty investigations would include searches, not only of the Civil Service Commission's own files, but also those of the following entities: Federal Bureau of Investigation; Military and Naval Intelligence; other appropriate Federal investigative or intelligence agencies; House Committee on Un-American Activities; and State, county, and municipal police.

Even if he had not directed the CSC to establish its master index and supplementary identifying information files, the nature of its lawful assignment would have required that it take this step. I believe it is well settled in law that the imposition of any lawful duty on a government executive automatically and constitutionally carries with it the authority to take whatever steps are necessary to the accomplishment of that obligation.

When President Eisenhower broadened the program to include security as well as loyalty factors in 1953, his Executive Order 10450 directed the Civil Service Commission to establish and maintain a security investigations index and to incorporate into it the index developed pursuant to the Truman order. An index, of

course, implies accompanying files; without them, it has no use of meaning.

I will conclude my summary statement with two court rulings generally related to the question of the time extensiveness of adequate security intelligence files, the matter of how far back in time they must reach to serve their purpose.

In the *Communist Party* case, the Supreme Court noted:

Where the current character of an organization and the nature of its connections with others is at issue, of course past conduct is pertinent. Institutions, like other organisms, are predominantly what their past has made them. History provides the illuminating context within which the implications of present conduct may be known.

The court of appeals, in this same case, observed:

It is rarely, if ever, possible to prove present nature by some instantaneous, contemporaneous fact, totally ignoring the whole of the past. Not only is the past clearly pertinent, it may be quite material to a determination of present nature. Whether it is material depends upon whether there is affirmative evidence of a departure from the established past. In the ordinary affairs of life and in ordinary litigation, if a person or an organization is shown to have had over many years a certain policy and program, and no more is shown, the conclusion is clearly indicated that he or it has the same policy and program in the present.

In loyalty-security investigations and judgments, the Civil Service Commission and the Office of Personnel Management have had to constantly determine the current character, and also the past character, of individuals they investigate and the organizations with which they have been affiliated. To do so they have needed files that are not only currently broad, but which also reach far back in time to enable them to make reasoned judgments about the present, in light of relevant past history.

That concludes my statement.

[Prepared statement of Mr. McNamara follows:]

PREPARED STATEMENT OF FRANCIS J. McNAMARA,
EXECUTIVE DIRECTOR, THE HALE FOUNDATION

Let me begin with a few general observations about that most important human activity, the retention of knowledge, without which there can be no progress or effective work in most human endeavor.

Even animals have memory, the first step in knowledge retention. Some of us humans are forgetful, a few have what is called perfect recall, most have what would be considered average memory. No matter what our memory ability, however, no one can ever remember everything ever learned, no matter how "perfect" his or her recall or how important the subject matter. We are distinctly superior to animals in that we have learned to store our "memory" of acquired knowledge outside ourselves and in retrieveable form.

For centuries we have recognized the tremendous debt civilization owes to whoever first conceived the idea of writing and of an alphabet, to the inventor of paper, of bookbinding and printing. On the other hand, it could be said we have never adequately acknowledged the debt we owe to whoever it was who first conceived the idea of filing information.

Books are great for storing knowledge -- but files are much better in many ways. New knowledge can be added to them continuously and easily and just as easily retrieved from them. They can be corrected, modified and refined very simply, with inaccurate date quickly removed from them, information which turns out to be questionable appropriately noted, and so on.

The opposite side of the coin on the question of the debt civilization owes in the knowledge retention area, is that whoever first thought of developing and maintaining files deserves no special acclaim or credit. It is so elementary a step in reasoning, so simply logical, so merely "commonsensical," that it would occur even to a person of limited intellectual ability.

Regrettably, the question of intelligence files -- which is what we are dealing with here -- has become largely an ideological rather than an intellectual question in recent years. It has been

said over and over again that they are not needed or should not be developed or maintained because they violate some right of the individuals or organizations on which they are kept.

When the assault on intelligence collection, including the maintenance of files, was in full swing a number of years ago, I had occasion to testify before the Senate Subcommittee on Internal Security. One of the points in my testimony was this: the absolute need for intelligence collection in the security and criminal areas had been emphasized and stressed by every national commission appointed to look for solutions to problems in these areas during the previous dozen years. Findings and recommendations of the following seven bodies on this subject were placed in the record:

President's Commission on the Assassination of
President John F. Kennedy (Report, 1964)

President's Commission on Crime in the District
of Columbia (1966)

President's Commission on Law Enforcement and
Administration of Justice (1967)

National Advisory Commission on Civil Disorders
(1968)

National Commission on the Causes and Prevention
of Violence (1969)

President's Commission on Campus Unrest (1970)

National Advisory Commission on Criminal Justice
Standards and Goals (1973)

Importantly, every one of these bodies found the U.S. deficient in the intelligence area applicable to the problems they investigated and urged stepped up intelligence efforts as a means of adequately dealing with those problems.

Another important point: the work of these bodies represented almost nine years of concentrated study by hundreds of highly qualified people: members of the commissions, all of whom were prominent in some area of American life; their staffs, and their numerous consultants. All relevant major intellectual disciplines were represented. They included historians, sociologists, lawyers, prosecutors, doctors, clergymen, psychologists, professional law enforcement personnel and representatives of all levels and branches of government.

Their unanimous findings on the need for more and improved intelligence, over and above the concept of its basic general

necessity, utterly demolishes the silly ideological pap we have been fed in the recent past on the subject of national, state and local intelligence collection activities.

Intelligence embraces four basic steps: collection, storage, analysis, and dissemination.

Files are the essential knowledge retention step, the stored memory. Because security-related knowledge is normally so extensive and minutely detailed that it is far beyond the memory capabilities of any individual or group of individuals, there can be no useful intelligence or security without files. They are a must. This is true whether one is concerned with ICBMs, chemical warfare, reconnaissance satellites, trade in strategic goods, foreign affairs, hostile intelligence services, or groups and individuals associated in varying degrees and ways with what we call domestic security problems, either as they apply to the federal personnel security program or other matters.

Do extensive intelligence files on individuals and groups violate fundamental rights? The Supreme Court says "no." It so ruled in Laird v. Tatum.

The basic facts in that case are as follows. During the riotous 1960s, local and state police found themselves incapable of controlling rampant violence. As a result, many millions of dollars worth of property was destroyed, thousands of American citizens were injured and many killed. The physical wreckage of that period can still be seen here in Washington and other cities. President Johnson correctly assigned the Army riot-control duties, and the Army -- correctly and intelligently -- decided that it had to collect civil disturbance-related intelligence to carry out those duties.

The Army's collection of intelligence on actual and potential violence-prone groups and individuals was extensive and widespread -- as it should have been, because it could never tell just where and when and under what circumstances its specially trained forces might be called upon to put down massive, otherwise uncontrollable violence that threatened human life and property. Its files, like those of the CSC and OPM, were based largely on public source information.

One Arlo Tatum and others on whom the Army has assembled information sued, claiming violation of their rights under the 1st, 4th, 5th and 9th Amendments and their right of privacy. They asked for a finding that the intelligence collection was unconstitutional and illegal, a ban on its continuation, and the destruction of all information collected in the program.

The trial court denied their claims, stating:

The Court holds that what in effect the plaintiffs are complaining of here is that the Army is keeping the type of information that is available to all news media in this country, covered by all news media in this country, and which is in the morgues [files] of the newspapers in this country and magazines, and the Court holds that they state no cause of action; they show no unconstitutional action on the part of the Army; they show no threats to their rights.

The Court of Appeals for the District of Columbia Circuit reversed the District court.

The government took the case to the Supreme Court which in 1972 reversed the appeals Court and upheld the original finding of the District Court. It noted that the military was not concerned with law enforcement and had power to act against people on its own, and was therefore a greater threat to civil liberties than civilian investigative agencies (not being subject to "the well-defined restrictions of law and approval of the courts"). Despite this, the Supreme Court said:

In performing this type function the Army is essentially a police force or the back-up of a local police force. To quell disturbances or to prevent further disturbances the Army needs the same tools and, most importantly, the same information to which local police forces have access. Since the Army is sent into territory almost invariably unfamiliar to most soldiers and their commanders, their need for information is likely to be greater than that of the hometown policeman.

No logical argument can be made for compelling the military to use blind force. When force is employed it should be intelligently directed, and this depends on having reliable information--in time...As Chief Justice John Marshall said of Washington, "A general must be governed by his intelligence and must regulate his measures by his information...So we take it as undeniable that the military, i.e., the Army, need a certain amount of information in order to perform their constitutional and statutory missions..."

The information gathered is nothing more than a good newspaper reporter would be able to gather by attendance at public meetings and the clipping of articles from publications available on any newsstand.

Case dismissed; no cause for complaint; no violation of any constitutional right; nothing illegal, the Supreme Court ruled of the Army's collection of intelligence for a legitimate purpose.

Obviously, the Civil Service Commission's collection of the intelligence at issue here was for a legitimate and Constitutional purpose -- the preservation of the national security and the integrity of the federal civil service.

President Truman placed a tremendous intelligence burden on the Civil Service Commission, predecessor of the Office of Personnel Management, when he issued Executive Order 9835 in 1947, instituting the government's present personnel loyalty-security program. He made the Commission responsible for investigations of the loyalty of all current employees of agencies and departments that did not have investigative services of their own and all new entrants into the competitive service.

He intelligently directed the Commission to establish and maintain "a central master index" of all persons investigated for loyalty by any agency or department since September 1, 1939, along with "adequate identifying information" about such people. He further directed that all loyalty investigations would include searches not only of the CSC's own files, but also those of the following entities:

- Federal Bureau of Investigation
- Military and Naval Intelligence
- Other "appropriate" federal investigative or intelligence agencies
- House Committee on Un-American Activities
- State, county and municipal police

Even if he had not directed the CSC to establish its master index and supplementary identifying information files, the nature of its lawful assignment would have required that it take this step. I believe it is well settled in law that the imposition of any lawful duty on a government executive, automatically and constitutionally carries with it the authority to take whatever steps are necessary to the accomplishment of that obligation.

When President Eisenhower broadened the program to include security as well as loyalty factors in 1953, his Executive Order 10450 directed the CSC to establish and maintain a "security-investigations index" and to incorporate into it the index developed pursuant to the Truman order. An index, of course, implies accompanying files. Without them, it has no use or meaning.

I will conclude my prepared statement, Mr. Chairman and members of the Committee, with two court rulings generally related to the question of the time-extensiveness of adequate security-intelligence files, the matter of how far back in time they must reach to serve their purpose.

In the Communist Party case, the Supreme Court noted:

Where the current character of an organization and the nature of its connections with others is at issue, of course past conduct is pertinent. Institutions, like other organisms, are predominantly what their past has made them. History provides the illuminating context within which the implications of present conduct may be known.
(CP v. SACB, 367 U.S. 1, 69)

The Court of Appeals, in the same case, observed:

it is rarely, if ever, possible to prove present nature by some instantaneous, contemporaneous fact, totally ignoring the whole of the past. Not only is the past clearly pertinent, it may be quite material to a determination of present nature. Whether it is material depends upon whether there is affirmative evidence of a departure from the established past. In the ordinary affairs of life and in ordinary litigation, if a person or an organization is shown to have had over many years a certain policy and program, and no more is shown, the conclusion is clearly indicated that he or it has the same policy and program in the present...
(223 F. 2d 531, 570)

In loyalty-security investigations and judgments, the CSC and OPM have had to constantly determine the current character, and also the past character, of individuals they investigate and the organizations with which they have been affiliated. To do so they have needed files that are not only currently broad, but which also reach back far enough in time to enable them to make reasoned judgments about the present in the light of relevant past history.

It is the view of the Hale Foundation that the old CSC-OPM files should not be destroyed, that they should be returned to the OPM, and that OPM should reinstitute practical, everyday use of them. Without these files it cannot adequately carry out its personnel security duties.

Mr. LISKER. Thank you, Mr. McNamara.

Senator Denton asked that I, for the record, alert you, Mr. Warner, to the fact that none of the files should be disposed of until the full Judiciary Committee has had a chance to complete this inquiry.

Mr. WARNER. Yes, sir.

Mr. LISKER. Mr. McNamara, what is the Hale Foundation of which you are the director?

Mr. McNAMARA. The Hale Foundation is a nonprofit, tax-exempt organization concerned with the subject of intelligence. As we say in our literature, we are "dedicated to enhancing the capability of U.S. intelligence to serve the fundamental objectives of the Constitution, that is, 'insure domestic tranquillity, provide for the common defense, promote the general welfare.'"

Mr. LISKER. Does the foundation have a policy or an advisory board?

Mr. McNAMARA. Yes, we have a policy board. It includes Gen. Robert E. Cushman, former Commandant of the Marine Corps, and Deputy Director of the CIA; Adm. Thomas H. Moorer, former Chief of Naval Operations; Lawrence Silberman, former Ambassador to Yugoslavia and top Justice Department official; Norman Darwick, executive director of the International Association of Chiefs of Police; Frank Barnett, president of the National Strategy Information Center; W. Raymond Wannall, former Assistant Director of the FBI in charge of the Intelligence Division; and the cochairman, Lt. Gen. Dan Graham, former Director of the Defense Intelligence Agency, and Eugene Methvin, senior editor of the Readers' Digest, Washington Bureau.

Mr. LISKER. All the gentlemen who accompanied you here today to testify on these issues are all from the Government, and their positions speak for themselves. What is your background in the national security area?

Mr. McNAMARA. I have spent the last 5 years in independent research, primarily in the intelligence area. Prior to that time, I was Executive Secretary of the Subversive Activities Control Board, and, incidentally, its Security Officer. Prior to that appointment, I was the Staff Director of the House Committee on Un-American Activities, and also its Research Director for several years.

Prior to that, I was with the Veterans of Foreign Wars as national director of its security program. In the early 1950's I was editor of Counterattack, a weekly newsletter on communism published by a group of ex-FBI agents. In World War II, I had intelligence assignments. I was Intelligence Officer of the First Provisional Tank Group, Chinese-American, in Burma.

Mr. LISKER. What is your reaction as an expert in the area that the Civil Service Commission/Office of Personnel Management files can be destroyed because they are merely duplicative of the FBI's files, and have no historical value?

Mr. McNAMARA. I would reject that claim. The first thing I would point out, as noted in my prepared statement, is that when President Truman established the loyalty program, he ordered the CSC not only to develop files of its own, but to check those of the FBI, military intelligence, House Committee on Un-American Activities, and other agencies. This was because he, and his top secu-

rity advisors, fully realized at the time that each one of those agencies would have different information on any subject, they would not be duplicative or the same.

You can assign any four groups, let us say, to investigate any matter at any time, and they are going to come up with different facts. This is in the nature of human activity. Unless they exchanged every bit of information they developed, you would find different information in the results of their respective investigations.

Another point, of course, is that the Civil Service Commission does not have, and never has had, an investigative staff comparable to that of the FBI. In addition, unlike the FBI, it has never had a nationwide network of undercover operatives in the Communist Party, in the Nazi, Fascist, KKK groups, and so on. So there is no chance that the Civil Service Commission would have files duplicative of the FBI.

I may point out that when I was with the House Committee on Un-American Activities, the Civil Service Commission had assigned to the committee several people who worked there all day long. They came in the first thing in the morning, the same as our staffers, and they spent the entire day, every day of the week, checking our files for information on applicants and employees of the U.S. Government in response to the Civil Service Commission's duty to do this as expressed in the Truman order, and carried over in the Eisenhower order.

This was done, again, because the committee's files contained much information that the Civil Service Commission's own files lacked.

Mr. LISKER. You have indicated that the Civil Service Commission's files couldn't approach those of the FBI because the resources were really not the same. But looking at it conversely, would the FBI files, because of these additional resources, more than duplicate the Civil Service Commission's files?

Mr. McNAMARA. Not necessarily because there just isn't any such thing as perfect coverage by any agency, including the FBI. Generally speaking, the committee's files dated back years before the Commission's, and we possessed much information that they didn't. But there were occasions, when I was director of the committee, when I was given access to the files of the Civil Service Commission, and they were very useful in some committee investigations.

I might point out that this was public source material, not anything developed as a result of investigative work and, as I said, we found it useful. We cooperated with the Civil Service Commission in sharing our knowledge and information, and with the FBI; it was a three-way thing, designed to do everything we could, working together cooperatively, in a proper constitutional way, to improve security all around.

Mr. LISKER. What about the claim that was made at the 1978 hearing that section (e)(7) of the Privacy Act required the discontinuation of the use of the files?

Mr. McNAMARA. I would disagree with that. I have here a copy of the Privacy Act, and the section referred to says that:

Agencies will maintain no record describing how any individual exercises rights guaranteed by the first amendment unless expressly authorized by statute, or by the individual about whom the record is maintained, or unless pertinent to and within the scope of an authorized law enforcement activity.

To illustrate why I disagree: Volume 2 of the Internal Security Manual, published by the Senate Subcommittee on Internal Security in 1974, and revised to July 1973, has a section entitled "The Federal Security Program * * * Chronological Table of Statutes and Executive Orders Through 1960." An Executive order, as you know, has the force of law. That section covers 53 pages. So it is very obvious that the program is authorized by statute.

Then you look at President Eisenhower's Executive Order 10450, the third paragraph:

Now, therefore, by virtue of the authority vested in me by the Constitution and Statutes of the United States, including section 1753 of the Revised Statutes, 5 U.S.C. 631, the Civil Service Commission Act of 1883, 5 U.S.C. 632, et seq., section 9(a) of the act of August 2.

Then it goes on citing several more statutes. It is very clear to me at least that this program comes under the exemption provided in the Privacy Act.

Mr. LISKER. You indicated that during the riots of the 1960's the Army engaged in extensive and widespread intelligence collection on violence prone groups. In point of fact, didn't the collection process start years earlier under President Eisenhower in an effort to gather information on the Klan and other extremist groups which were attempting to interfere with enforced school desegregation?

Mr. McNAMARA. Yes, there was some activity in that period, but the really big operation, shall I say, took place under President Johnson. Because we had had massive riots which, as I said, the police could not control—it was beyond their power—Federal support was essential. President Johnson gave the Army this job, and a number of special battalions of several thousand men each were given special training in riot control duties. They were held available at any time to be flown to any part of the country to assist the State and local police in putting down violence.

Mr. LISKER. Could you give us some practical examples of the need for what might be called ancient history in judging the current security cases?

Mr. McNAMARA. Yes, I have one example here that I would like to mention.

This is an item in an Associated Press dispatch of July 17, 1971, which appeared in the New York Times the following day. The basic facts in the case were that a 22-year-old postal worker, who had been hired the previous November, in 1970, had received an order from the Civil Service Commission calling on her to show cause why she should not be dismissed from employment. She was charged with 14 specific acts.

The article indicates that they concerned activities in SDS—in the years 1969 and 1970, and the Civil Service Commission had developed this information as a result of an FBI check.

Mr. LISKER. SDS meaning the Students for a Democratic Society?

Mr. McNAMARA. That is correct.

I don't know the results of that case. But suppose that that woman today, whether she was fired or not, but someone like her

from that period should apply for a Government position. The Civil Service Commission, now the OPM, would have to have background information to make an intelligent analysis of what her participation in SDS meant.

SDS actually grew out of the Student League for Industrial Democracy, youth group of the League for Industrial Democracy which dated back to the early part of this century. In 1959, SLID was renamed SDS. At that point, the Student League for Industrial Democracy was a socialist organization. It was not violence prone. It did not agree with our political and economic system, but it believed in changing it by legitimate means. This means that a lot of the kids originally in SDS were socialist, but not subversive. They did not believe in violent overthrow or anything like that.

The other point is this, when SDS was first formed it was anti-Soviet, as well as anti-United States. Its attitude was, "a plague on both your houses." They wanted what they called participatory democracy. They actually banned Communists as members for the first few years of their existence, there were no Communists allowed.

That meant nothing to the Communists, and they started to penetrate the group, and as a result SDS became more and more radicalized. In 1965 SDS eliminated its ban on Communists. Then the Communist Party, the Socialist Workers Party, the Progressive Labor Party, all moved in in numbers, each one of them making an effort to take over SDS.

The result was finally that in 1969, when it had grown to some 20,000 members from about 200, it was split apart by these warring Communist factions, each one fighting for control. They broke it up.

Again, today, if the OPM is trying to make a determination about some employee or applicant for employment who was associated with SDS back in the 1960's period, it has got to have facts about that organization that date back at a minimum 20 years to really understand it, and to make an honest and fair judgment about the person's participation.

Mr. LISKER. I think we need to make a distinction here between two groups of files, and all we are talking about today are the individual personnel files the personnel investigation.

I certainly understand your point from the standpoint of an historical appreciation for organizational files. But if we restrict our comments only to the individual files, what justification in your view would there be for keeping files from the late 1920's through the late 1950's, individual files I am speaking of.

Mr. McNAMARA. Let me point out, my original understanding was that this hearing embraced all files, and there was some clarification of it during the testimony of the previous witnesses. I understood, as I said, that it included both organizational and individual files.

Let me point out this. Generally, statistics are not available on this subject, but thinking of this young woman who was referred to in the New York Times article, who was then 22 years old. I made a study when I was with the subversive activities control board to try to get some guidelines on this problem. Among other things, I discovered that there is something like 100,000 new hires by the

Federal Government each year of people under age 29. At the same time, there tens of thousands of hires of people in the ages 50 to 70. My study also indicated that the great majority of people, while you can engage in subversive activity at any time of your life, do so in their late teens and early twenties.

If this is true, and you are hiring tens of thousands of people each year in the 50 to 60 age bracket, and they are undoubtedly going into the most responsible jobs in Government, the most sensitive ones, your files must reach back many years to cover the period of their youth.¹

The other thing to consider is this, when President Truman instituted his loyalty program in 1947, the Communist Party and similar groups were, in effect, put on notice that the Government was going to do everything it could to keep them out. They have had ever since then to work on plans, and ways and means of getting around that barrier that was erected in the loyalty-security program. The creation of sleepers, and so on, and is just one example of what I am talking about.

If a bright young man was given a sleeper assignment, or a young woman, back in the late 1940's, let us say, this is 1980, and you have to reach back 30 years to see if this person had an earlier public record of Communist activity that might be a tipoff. You would have reach back 30 years to come up with a record on that individual.

I might point out that the study I made at the time was keyed to the Attorney General's list, and the question was, if a group on the list is defunct, should it be taken off the list, or left on it? If it is left on for the time being, when should it be taken off, when it has been dead for 10, 20, or 30 years?²

¹ Information which, with some interpolation, was helpful in this analysis, however, was found in a chart published in the Civil Service Journal of July-September 1971 (hereafter referred to as the Chart, see attached copy). The Chart, based on data from a 10 percent sampling, contained information on the age levels and service periods of all Government employees.

Considering the above-mentioned factors one by one:

1. Probable Period of Subversive Activity.

Obviously, a person may engage in organizational subversive activities at any time in life. During the past two decades the Communist Party has definitely had more middle-aged and older members than young members. In addition, there are plenty of middle-aged people—and even old fogies—in the Party's fronts.

Despite this, one study of the U.S. Communist Party indicates that a person is most likely to join it in the late teens and early twenties, specifically the ages 18 to 23.* Another study, which included members of the British, French, and Italian as well as the U.S. Communist Party, revealed that 21 percent of their members had engaged in their first radical activities before they were age 16 and that 49 percent had first engaged in such activity before age 18. Only 25 percent had not engaged in radical activity of any kind until age 23 or after.

This study also revealed that 54 percent of all Party members had joined the Party only after first being affiliated with front organizations and that 11 percent had joined following membership in the Young Communist League.**

These facts indicate that the Attorney General's list, to be effective for security purposes, should be so devised that it will reach back to encompass the years during which the persons being checked would most likely have been associated with subversive groups, i.e., their teen years.

*Morris L. Ernst and David Loth, "Report on the American Communist," Henry Holt and Company, New York, 1952, p. 2.

**Gabriel A. Almond, "The Appeals of Communism," Princeton University Press, 1954, pp. 217-221.

² Executive Order 11605, promulgated by President Nixon on July 2, 1971, gave the Subversive Activities Control Board (SACB) certain powers in relation to the so-called "Attorney General's

I believe this memo is pertinent to the question of Civil Service Commission's files as well. It involves the same issue. If you merely substituted "the files" for "the Attorney General's list" in this memorandum, I think it might shed some light on the subject.

My final determination, based on age breakdowns of government employees, and new hires each year, was that a group should be kept on the Attorney General's list at least for 25 years. Statistically, you have an argument for 40 years, but if you do that you can make the list look silly in the eyes of the public, and susceptible to criticism and ridicule by its critics. I would say, in general, security information is relevant to the government's personnel security program at least going back over a period of 25 years.

I will be glad to submit this for the record, if you would care to have it.

Mr. LISKER. I was going to ask you. With your permission, and without objection, it will be made part of the record.

[Document follows:]

list" (of fascist, communist, subversive, etc. organizations). One was the authority to determine, upon petition of the Attorney General, that organizations on the list had "ceased to exist."

The order also provided that "consistent with . . . [such] . . . determinations of the Board" the Attorney General would revise or modify the information concerning the list which he supplied to government departments and agencies in connection with the personnel security program.

Pursuant to Executive Order 11605, the Attorney General, between October 1, 1971 and July 17, 1972, petitioned the SACB to find that 233 of the 283 groups on the list had ceased to exist. The Board filed the last of its reports on these petitions with the Attorney General on October 13, 1972. It found that all the groups which were subjects of the petitions had ceased to exist. A few had been defunct for 30 years or more, a large number for over 20 years; one for five years.

The Attorney General and the Board were barred from taking further action to clarify the status of groups on the list by passage of an appropriations amendment introduced by Senator Sam Ervin which provided that no money appropriated for the Board could be used to implement the provisions of Executive Order 11605.

The Order did not provide that defunct groups should be removed from the list. The fact that so many organizations on it had ceased to exist years earlier, however, raised that question and also the question of whether they should be removed when they had been defunct for a certain period of years. This was the question addressed in Mr. McNamara's memo to the Board.

SUBVERSIVE ACTIVITIES CONTROL BOARD

January 17, 1972

MEMORANDUM

TO : Chairman and Board Members

FROM : Francis J. McNamara, Executive Secretary

SUBJECT: Defunct Groups on the Attorney General's List

The Board has received 82 petitions, pursuant to Executive Order 11605, to find that organizations on the Attorney General's list have ceased to exist. It could receive about 190 more of this type because all except 13 of the 283 groups now on the list are defunct.

After the Board makes its findings on these petitions, a determination will have to be made as to what should be done about the defunct organizations. Should they be retained on the list with a notation of the year they ceased activity? Or should they be eliminated from it if they have been defunct for a certain number of years? If the latter, what period of years should be the criterion for removing them from the list?

The Commission on Government Security recommended in its 1957 report that defunct organizations be retained on the list with a notation showing the date of their dissolution and related relevant circumstances.

The Senate Internal Security Subcommittee made the same recommendation in a 1955 report.

The Special Committee on the Federal Loyalty-Security Program of the Association of the Bar of the City of New York recommended in a 1956 study that organizations which have been defunct for more than ten years should be removed from the list, but that the Department of Justice should maintain relevant information about such groups and make it available to security personnel and agencies upon request.

The Administration position on this issue has apparently not been decided as yet. Thus far, Justice has petitioned the Board to find that organizations have simply ceased to exist, or have ceased to exist for 10 years prior to filing of petitions. It is not known whether the 10-year request indicates a disposition toward the thinking of the New York City Bar Committee rather than that of the Commission on Government Security and the Senate Subcommittee.

The Board has no authority in this area and, for understandable reasons, its views have not been solicited. Despite this, because of its role in the security area and its relationship to the Attorney General's list per Executive Order 11605, this question is of interest to it. The following facts and thoughts are presented for its consideration for this reason.

Basic Principle and Related Factors

Logic dictates that the key factor in determining whether defunct groups should be removed from the list, and on what basis, should be the effect this will have on the utility of the list as a security instrument.

This can be determined only after considering related factors such as the following:

1. The age at which a person is most likely to engage in organizational subversive activities.
2. The nature of security checks and the period when the Attorney General's list has ~~the~~ practical application to government employees and applicants.
3. The number of new employees hired by government each year and their age breakdown.
4. The age breakdown of all present government employees.

In preparation for this analysis the Civil Service Commission was asked to furnish the average number of applicants and new hires for the last five years, the breakdown of each of these groups by ten-year age levels, and additional data. It was able to provide only the total number of applicants and new hires for each of the last five years.

Information which, with some interpolation, was helpful in this analysis, however, was found in a chart published in the Civil Service Journal of July-September 1971 (hereafter referred to as the Chart, see attached copy). The Chart, based on data from a 10% sampling, contained information on the age levels and service periods of all Government employees.

Considering the above-mentioned factors one by one:

1. Probable Period of Subversive Activity

Obviously, a person may engage in organizational subversive activities at any time in life. During the past two decades the Communist Party has definitely had more middle-aged and older members than young members. In addition, there are plenty of middle-aged people--and even old fogies--in the Party's fronts.

Despite this, one study of the U. S. Communist Party indicates that a person is most likely to join it in the late teens and early twenties, specifically the ages 18 to 23.¹ Another study, which included members of the British, French, and Italian as well as the U. S. Communist Party, revealed that 21% of their members had engaged in their first radical activities before they were age 16 and that 49% had first engaged in such activity before age 18. Only 25% had not engaged in radical activity of any kind until age 23 or after.

This study also revealed that 54% of all Party members had joined the Party only after first being affiliated with front organizations and that 11% had joined following membership in the Young Communist League.²

These facts indicate that the Attorney General's list, to be effective for security purposes, should be so devised that it will reach back to encompass the years during which the persons being checked would most likely have been associated with subversive groups, i. e., their teen years.

2. Security Checks and Applicability of Attorney General's List

All applicants for Government employment undergo a security check prior to appointment or shortly thereafter (in the latter case, retention is conditioned on the outcome of the check). The scope of the investigation depends on the relationship of the position to be held to the national security.

The minimum security check requirement is a National Agency Check and Inquiry (NACI) for non-sensitive positions. ~~As NACI consists of a check~~

1 Morris L. Ernst and David Loth, Report on the American Communist, Henry Holt and Company, New York, 1952, p. 2.

2 Gabriel A. Almond, The Appeals of Communism, Princeton University Press, 1954, pp. 217-221.

of the files of the FBI, Civil Service Commission and, if appropriate, Immigration and Naturalization Service and/or military intelligence agencies (for high-level positions, HCIS files are also checked), plus letter of inquiry to former employers, schools attended, and law-enforcement agencies at places of employment, education, and residence.

A full background investigation is required for critical-sensitive positions and certain other high posts such as those filled by Presidential appointment with Senate confirmation, though they may not be classified as sensitive. It is also required for some, but not all, non-critical sensitive positions.

A full background or "field" investigation entails an NACI, plus personal investigative interview of previous employers, present and past neighbors, associates, references, and local police files.

Full background investigations may be made by the appointing agency, the Civil Service Commission, or the FBI. They are always made by the FBI when a check or investigation by another agency develops derogatory or questionable information in the loyalty-security area.

The Attorney General's list serves as the major security screening weapon at the time an applicant for Government service, in any kind of position, is initially checked or investigated prior to permanent employment.

This is when the list has its first practical application. Theoretically, it contains the names of all organizations so anti-democratic in nature that affiliation of any kind with them automatically raises a question about a person's fitness for Federal employment (though it is not necessarily a bar to it).

In some agencies a recheck of the security status of employees holding sensitive positions is supposedly made at regular intervals (i. e. every five years), although this is not always carried out in practice.

Once a non-sensitive job-holder passes an NACI there is normally no further security check on him unless, at some future time, he is a candidate for a sensitive position. A full field investigation is then made and the Attorney General's list becomes even more important as a security instrument than it was at the time of its initial use in his case. The list, of course, also has continuing importance as sensitive position holders are rechecked for security reasons.

Unfortunately, age breakdown statistics as to when such status changes usually occur in the cases of employees who start service in non-sensitive positions are not available. Some move into sensitive positions a few years later, others not till 20-30 years after being employed.

It is therefore possible only to generalize by saying that the Attorney General's list has important significance as a security instrument when it is used as an initial check on an applicant's fitness for employment, and probably its greatest importance a few or many years later, at some indefinite future date, when he moves into a sensitive position.

The NACI is a generally effective security measure and probably as thorough as is politically feasible. A full background investigation is obviously much more effective. Both, however, are far from perfect for the following reasons:

1. The files of the above-listed Federal agencies and local police do not, and have never, contained a complete list of the names of all persons who have ever been associated with groups on the Attorney General's list as members, or through sponsorship, contributions, services performed, attendance at meetings, rallies, etc.

This is because -

- (a) Complete coverage of all such activity is an impossibility.

- (b) At various times some of the agencies concerned have operated under personnel and financing limitations that have made it impossible for them to compile and index all available data on the subject.

- (c) Since 1961, when the Supreme Court upheld the constitutionality of the Subversive Activities Control Act, the Communist Party has done away with formal membership in its front organizations for security reasons. Many of the "new left" groups which have sprung up in the last decade have also rejected use of the formal membership concept for the same reason.

2. The Attorney General's list has never approached being a complete roster of all subversive organizations.

There are now 283 groups on the list. Over the years, a number of groups have been removed from it. At its peak, however, it did not embrace as many as 300 organizations.

By contrast, the "Guide to Subversive Organizations and Publications," last published by HUAC in 1961, lists 659 organizations found to be Communist by various Federal authorities, plus 156 found to be Communist by State and territorial agencies, for a total of 715. Deduct 240 for the number of Communist groups on the Attorney General's list which are duplicated in this total and it appears that there are about 475 officially cited Communist organizations that have never been on the Attorney General's list.

In addition, the Guide contains the names of 121 publications found to be Communist by Federal authorities and an additional 25 cited by State and territorial agencies, for a total of 146. Adding this figure to the 475 organizations results in a total of 621 groups and publications officially found to be Communist that never have been on the Attorney General's list.

Deduct 100-odd from the total to allow for some duplication and you will still end up with 500 cited Communist groups that have never been considered as criteria in the personnel security program.

It should be stressed, moreover, that no one has ever claimed that the Federal, State and territorial agencies whose findings are compiled in the Guide have investigated or cited every Communist organization that has ever existed in this country.

Also, the Guide lists only Communist groups. It does not include other types of subversive organizations.

Finally, the Guide has not been updated for 10 years and a fair number of groups and publications have been cited as Communist since 1961.

3. No groups have been added to the Attorney General's *list* for over 16 years. Technically, a person could be a member or leader of the W. E. B. DuBois Clubs of America, the Party youth arm

during the years 1964-1970, and still be employed by the government. The same applies to persons affiliated with all other "subversive" groups (Communist, Nazi, Fascist, etc.) formed during the past 16 years. Federal security officers have testified before HCIS, for example, that Panthers, PLP'ers, SDS'ers and members of YSA have been employed by some agencies in recent years.

Kimbell Johnson, Director of the CSC Bureau of Personnel Investigations, testified before HCIS on September 30, 1970, "in terms of organizational affiliation, the Government is practically without a yardstick at this time."

For the above reasons the Attorney General's list has always been a far from perfect checking device for security purposes. Thus, even with perfect NACI's and full background investigations, there are gaps in the security screening process--because the results are weighed against a far from perfect tool.

3. Annual Number of Applicants and New Hires

the The Civil Service Commission has furnished the following data concerning the number of applicants for government employment it processed and new hires for each of the last five years (CSC does not process applicants for the CIA, FBI, etc.):

<u>FY</u>	<u>Applicants</u>	<u>New Hires</u>
1967	1, 874, 239	936, 000
1968	2, 685, 775	768, 720
1969	2, 260, 888	608, 088
1970	2, 435, 534	485, 298
1971	2, 888, 600	478, 022

The above figures indicate that an average of 2, 429, 000 persons have applied for government positions, and an average of 855, 000 have been hired, in each of the last five years. Unfortunately, age breakdowns of the above totals are not available although this is the key element in determining how far back the Attorney General's list must reach to encompass the years when most, or significant numbers and types, of the 855, 000 annual new hires would most likely have engaged in organizational subversive activities.

The Chart, however, reveals that of the 730,000 government employees who, in 1970, had less than five years service, the age breakdown was as follows:

<u>Age Bracket</u>	<u>No.</u>	<u>Percentage</u>	<u>Average No. Hired Per Annum</u>
Under 20	75,477	10.3	15,097
20-29	402,642	55.1	80,528
30-39	119,930	16.5	23,986
40-49	80,928	11.1	16,185
50-59	40,954	5.6	8,190
60-69	9,687	1.3	1,937
Over 70	557	0.1	111

Presuming that the new hires during the years 1967-71 fell into approximately the same age groups, over 65% of them were age 29 or under. To encompass the earliest age at which any of them were likely to have subversive organizational ties the Attorney General's list would have to include groups active in 1958-59 (when the 29-year-olds were 17-18). This indicates that the very minimum requirement for a useful 1970 Attorney General's list would be that it include groups that might have ceased to exist 12 years earlier.

More important, more than 200,000 (over 27%) of all government employees with less than 5 years service in 1970 were in the 30-49 year old age bracket. The 1967-71 new hires in this age group would therefore probably number about 223,000. To reach the earliest year when the oldest of these was likely to have had subversive organizational ties the list would have to reach back 31 years to include groups that might have ceased to exist in 1938-39.

Another factor. Though statistics are not available, it seems reasonable to conclude that of all those with less than 5 years service in 1970, those who ~~had been~~^{were} employed for positions with the greatest administrative and policy responsibilities (the most sensitive positions) would be those in the 40-59 age group. There were over 120,000 in this category, indicating that about 24,000 had been hired in each of the last 5 years. By interpolation, this would indicate that roughly 25,000 of the new hires in each of the years 1967-71 " were also in the 40-59 age group.

To include the period when the oldest of these were most likely to have been affiliated with the Communist Party of other subversive groups, the list

would have to reach back 41 years to 1929. Insofar as it did not do so, it would have limited value as a criterion for determining the security status of these people. Moreover, some of those hired for important positions in the years 1967-1971 were undoubtedly over age 59 (an average of over 2,000 in this age level were hired each year). For a thoroughgoing check on these people the list would have to reach back well into the Twenties.

4. Present Employee Age Levels

The Chart revealed that:

As of June 30, 1970, there were 2,823,575 Federal civilian employees.

Their average age: 41.

Their average length of service: 13 years.

Their average hiring age, therefore, was: 28.

Averages are misleading in analyses such as this because hundreds of thousands of employees are considerably older, or younger, than 41 and their service much greater, or less, than 13 years.

Nevertheless, it is interesting to note that if "Mr. Average Employee" of 1970 had engaged in organized subversive activities during the period when people are most likely to do so (ages 17-23), it would have been in the years 1946-1952. Thus, from the overall averages viewpoint, the Attorney General's list should include groups active 24 years ago (and possibly defunct more than 20) if it is to be fully effective as a security instrument. To encompass groups in which he might have been active immediately before being hired, it would have to reach back at least 13 years, from 1970 to 1957.

Actual age-level and years-of-service breakdowns are essential to meaningful analysis, however. The Chart reveals that the breakdown of the nearly 3 million government civilian employees by ten-year age groups, in numbers and percentages, was as follows in 1970:

<u>Age Level</u>	<u>No.</u>	<u>Percentage</u>
Under 20	75,477	2.7
20-29	461,430	19.9
30-39	546,149	19.3
40-49	799,943	28.3
50-59	658,968	23.4
60-69	173,794	6.2
Over 70	7,814	0.3

The years-of-service breakdown was as follows:

<u>Years</u>	<u>No.</u>
Under 5	730,175
5-9	548,501
10-14	418,603
25-29	357,450
30 & over	107,536

The four largest employee age groups, in order, were:

	<u>Age</u>	<u>No.</u>	<u>Percentage</u>
1.	40-49	799,943	28.3
2.	50-59	658,968	23.4
3.	20-29	561,430	19.9
4.	30-39	546,149	19.3

The years-of-service computation of the largest ten-year age group in the Federal service, those aged 40-49, and years in which they were hired was as follows:

<u>Years Service</u>	<u>No.</u>	<u>Percentage</u>	<u>Hire Period</u>
20-24	167,963	54.2	'46-'50
15-19	151,956	43.2	'50-'55
10-14	145,368	34.7	'55-'60
25-29	114,457	32.0	'40-'45

The years-of-service breakdown of the next largest age group, those aged 50-59, was as follows:

	<u>No.</u>	<u>Percentage</u>	<u>Hire Period</u>
25-29	194,047	54.3	'40-'45
20-24	108,684	35.	'45-'50
15-19	89,689	25.6	'50-'55
10-14	83,569	19.9	'55-'60

As far as present employees in non-sensitive positions are concerned, the Attorney General's list has no further significance unless they become candidates for sensitive positions. It will then have great importance.

From this standpoint the outstanding facts revealed in the preceding tables are:

There are 840,576 government employees age 50 or over and 464,986 who have 25 or more years of government service.

While many of these people will never hold sensitive positions, it is also true that the highest career GS positions will generally be filled by people in these categories.

There are over 50,000 people in the over-50 age group who have under 5 years of service, i. e., approximately 10,000 people in this age bracket are hired each year. It seems reasonable to assume that a considerable number of them go into important, well-paid, influential and sensitive posts, rather than into low-level jobs.

To include the time when both the career and new-hire 50 and older were most likely to have had subversive organizational ties it is necessary to reach back over 3 decades from 1970 to the Thirties. To the extent that the Attorney General's list does not include groups functioning during that period--groups that may have been defunct for over 30 years--it loses significant value as an aid in judging the security status of those filling some of the most important career posts in government.

55% of those with less than 5 years' service are in the 20-29 age bracket, which means that to be effective in relation to this youngest age group the Attorney General's list should include organizations that may have been defunct for as long as 12 or 13 years.

The importance of keeping the list up to date is indicated by the fact that 22% of all present Government employees (over 636,000) are aged 29 or younger. The current Attorney General's list, with only 13 extant organizations on it and no groups added to it since 1955, has been of relatively little value in judging the security fitness of almost 25% of all present Federal employees.

General Conclusions

If the Attorney General's list is to be truly meaningful as a security device, it must embrace groups active in the years when new hires, particularly those employed for the most responsible (sensitive) positions, are most likely

to have had subversive organizational ties and also the years when career government employees reaching their service peak most probably affiliated with such groups.

The age levels of new hires, with many thousands in the 40-60 range--and many of these probably being employed for higher-level positions--indicate that it would be a mistake to remove from the list groups that had been defunct only ten years, as recommended by the New York Bar Committee. The fact that the long-term employee who started Government service when young, would most probably advance into the most sensitive position of his career during this same age period argues the same conclusion.

The list would be practically useless in reference to these two key groups if it did not contain the names of organizations that had been defunct for ten years or longer.

The same would be true even in reference to the youngest 10-year age level employees, those 29 and under.

Probable Communist strategy must be considered. For all practical purposes, the present security program was initiated by President Truman's loyalty order of 1947 which served notice on the Party that the Government would do all it could to deny its members and agents government employment. Because penetration of Government is a basic Communist strategy and because the U. S. has been, and still is, the Number One target of the Communist powers, it must be assumed that Communist efforts to penetrate the Government despite the security program are still going on and have actually been intensified since 1947.

While the Party, with long-range aims, undoubtedly tries to get young people into Government service, it can get much quicker and better results by infiltrating an older person who would hold a position of greater responsibility.

Presuming the Party made a serious effort circa 1947 to develop young members into "sleepers" for future penetration of Government, these people would probably be in the 40-50 age bracket today. Their vulnerability would be that, before being assigned their sleeper role, they may have openly associated themselves with various Communist organizations (Party activity was very open and aggressive in the immediate post-World War II years). To detect these associations, the Attorney General's list would have to include organizations active in the 1945-48 period, i. e., groups that may be defunct for 20 years or more.

Based on the age-level and other statistics in this memorandum, once you get beyond the 20-year period, it would be possible to argue endlessly about the precise cut-off year for defunct groups on the Attorney General's list.

One factor to consider is that the list can be made to look ridiculous if defunct groups are kept on it too long. Technically, if the Government employs men in the '60's for important positions--as it does--an argument can be made that groups should be kept on the list even if they have been defunct for 40 years. This would look ridiculous, however; it would make the list subject to easy attack by security program critics and laughable in the eyes of many people.

A possible solution would be to eliminate groups from the list when they have been defunct for about 25 years, but to provide by executive order that affiliation with a group that has ever been on the list would be a factor that could be considered in determining a person's security status.

Federal civilian employment by age, sex, and length of service, June 1970 (estimated from the Federal statistics program 10 percent sample; includes youth program employees and excludes foreign nationals)

Years of age	Years of service—total men and women												Years of age																
	Total			5-9			10-14			15-19					20-24			25-29			30-34			35-39			40 and over		
	Number	Percent	Under %	Number	Percent	100.0	Number	Percent	100.0	Number	Percent	100.0			Number	Percent	100.0	Number	Percent	100.0	Number	Percent	100.0	Number	Percent	100.0	Number	Percent	100.0
Total	2,824,575	100.0	730.175	648,501	100.0	418,603	9,129	2.2	331,544	309,746	100.0	337,480	81,199	100.0	13,136	8,205	100.0	10.0											
Under 20	75,477	2.7	25,077	34.9	24,558	4.5	75,477	100.0	75,477	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
20-24	279,967	9.9	147,633	20.2	124,701	19.2	75,505	10.8	75,505	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
25-29	281,463	10.0	147,633	20.2	124,701	19.2	75,505	10.8	75,505	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
30-34	258,154	9.1	147,633	20.2	124,701	19.2	75,505	10.8	75,505	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
35-39	244,344	8.7	147,633	20.2	124,701	19.2	75,505	10.8	75,505	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
40-44	244,344	8.7	147,633	20.2	124,701	19.2	75,505	10.8	75,505	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	
45-49	452,530	16.0	36,394	5.1	63,895	11.6	75,533	18.1	69,529	19.9	101,671	32.6	5,574	1.8															
50-54	400,457	14.2	24,503	3.4	45,480	8.3	53,227	12.7	55,044	15.7	68,568	22.1	119,964	33.6	31,287	38.5	1,984	10.9	1,405	10.9	1,405	17.1	42.5	17.1	42.5	17.1	42.5	17.1	
55-59	258,511	9.2	16,051	2.2	35,342	4.6	36,342	7.2	34,645	9.9	40,098	12.9	74,083	20.7	5,832	35.5	7,714	42.5	3,890	47.4	3,890	47.4	32.8	47.4	32.8	47.4	32.8		
60-64	141,311	5.0	16,051	2.2	35,342	4.6	36,342	7.2	34,645	9.9	40,098	12.9	74,083	20.7	5,832	32.8	5,832	32.8	2,519	47.4	2,519	47.4	32.8	47.4	32.8	47.4	32.8		
65-69	41,101	1.5	2,486	0.3	5,776	0.8	14,414	0.3	18,839	1.7	21,159	0.4	36,818	10.3	2,519	1.0	2,519	1.0	2,519	1.0	2,519	1.0	2.2	1.0	2.2	1.0	2.2		
70 and over	7,814	0.3	857	0.1	1,014	0.2	1,115	0.3	1,025	0.3	1,115	0.4	1,427	0.4	801	1.0	801	1.0	801	1.0	801	1.0	7.2	1.0	7.2	1.0	7.2		
Total	854,193	100.0	377,584	100.0	163,215	100.0	100,925	100.0	85,152	100.0	57,942	100.0	58,492	8,850	2,497	836	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0		
Under 20	36,161	4.2	16,642	17.1	12,663	7.8	3,268	3.3	1,204	1.4																			
20-24	104,256	12.2	64,642	17.1	35,108	22.2	15,171	14.3	14,447	14.3	15,171	15.0	12,107	20.1	424	189	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7		
25-29	76,034	8.9	35,213	9.3	25,170	15.4	15,171	15.0	10,278	12.1	8,735	15.0	12,107	20.1	424	189	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7		
30-34	76,034	8.9	35,213	9.3	25,170	15.4	15,171	15.0	10,278	12.1	8,735	15.0	12,107	20.1	424	189	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7		
35-39	76,034	8.9	35,213	9.3	25,170	15.4	15,171	15.0	10,278	12.1	8,735	15.0	12,107	20.1	424	189	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7		
40-44	131,727	15.4	25,647	6.8	23,386	14.3	20,087	19.9	19,156	18.9	18,106	18.9	15,319	22.3	16,284	27.3	736	39.5	736	39.5	736	39.5	736	39.5	736	39.5	736		
45-49	95,151	11.1	16,063	4.3	16,074	9.8	15,160	15.0	12,485	14.7	10,278	17.7	14,278	24.0	2,062	189	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7	22.7		
50-54	68,353	8.0	8,672	2.3	8,305	5.1	10,367	10.3	7,368	8.7	6,164	10.6	9,083	15.2	565	78	9.3	9.3	9.3	9.3	9.3	9.3	9.3	9.3	9.3	9.3	9.3		
55-59	37,276	4.4	2,867	0.8	3,868	2.4	4,756	4.7	2,868	3.4	2,295	0.5	5,569	9.5	55	18	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2	2.2		
60-64	17,171	2.0	1,613	0.4	1,581	0.9	1,879	1.8	1,581	1.8	290	0.5	569	1.0	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7		
65-69	2,174	0.3	134	0.1	158	0.1	379	0.4	268	0.4																			
70 and over																													
Total	1,867,382	100.0	352,591	100.0	288,286	100.0	317,678	100.0	266,392	100.0	251,824	100.0	297,958	72,645	15,439	7,349	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0		
Under 20	39,316	2.1	39,316	11.2	12,295	4.3	5,841	1.8	7,268	2.7	4,716	1.9	11,628	3.9	1,960	1,216	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5		
20-24	177,227	9.5	182,991	23.9	88,415	30.9	59,056	18.6	65,495	24.6	67,586	22.9	103,700	34.8	4,011	2,510	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2		
25-29	182,120	9.8	35,381	10.0	50,641	13.1	53,940	16.9	66,480	25.0	59,689	20.4	103,700	34.8	4,011	2,510	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2		
30-34	211,950	10.8	16,297	4.6	54,543	14.2	53,940	16.9	66,480	25.0	59,689	20.4	103,700	34.8	4,011	2,510	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2		
35-39	260,372	13.9	16,297	4.6	54,543	14.2	53,940	16.9	66,480	25.0	59,689	20.4	103,700	34.8	4,011	2,510	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2		
40-44	303,308	16.3	16,297	4.6	54,543	14.2	53,940	16.9	66,480	25.0	59,689	20.4	103,700	34.8	4,011	2,510	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2	33.2		
45-49	190,158	10.2	7,379	2.1	17,010	4.4	13,975	6.3	22,160	8.3	29,818	11.8	59,605	20.4	2,517	1,216	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5	16.5		
50-54	95,417	5.1	4,314	1.2	8,784	2.3	9,088	3.1	11,471	4.3	14,157	5.6	27,755	9.3	1,941	510	6.6	6.6	6.6	6.6	6.6	6.6	6.6	6.6	6.6	6.6	6.6		
55-59	58,417	3.1	1,721	0.5	2,860	1.0	2,756	0.9	3,671	1.4	4,403	1.7	7,719	2.6	584	153	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9		
60-64	25,171	1.4	423	0.1	688	0.2	756	0.2	688	0.2	623	0.2	888	0.3	246	63	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8		
65-69	5,640	0.3	423	0.1	688	0.2	756	0.2	688	0.2	623	0.2	888	0.3	246	63	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8		
70 and over																													

NOTE: Percentages are rounded independently and not forced to add to totals.

• Less than .05 percent.

Mr. LISKER. Mr. McNamara, I have no further questions to ask on behalf of Senator Denton. Is there anything that you would like to add to your statement today?

Mr. McNAMARA. Let me make one point.

In its recent *Haig v. Agee* decision—that was on June 29 of this year—the Supreme Court, citing several precedents, said:

“It is ‘obvious and unarguable’ that no governmental interest is more compelling than the security of the nation.”

If this is true, it would seem to me that of all the records GSA, OPM, and anyone else might be interested in retaining, there is no more compelling need than for those concerning the national security. They take priority over all others.

I would like to make one other point. I called the Archives the other day to try to find out just how many cubic feet of files the government is holding. This official gave me a ballpark figure, he said, of 35 million cubic feet. To me, 20,000 cubic feet compared to 35 million cubic feet is like a flea on an elephant. It is nothing.

Mr. LISKER. Thank you very much.

My understanding is that this hearing will stand in recess subject to the call of the Chair.

[Whereupon, at 11:55 a.m., the subcommittee recessed, subject to call of the Chair.]

APPENDIX

ADDITIONAL MATERIAL FOR THE RECORD

SUBMISSION OF SENATOR DENTON

THE EROSION OF THE FEDERAL EMPLOYEE SECURITY PROGRAM: A CRITIQUE

(By David Martin)

DAVID MARTIN served for almost 20 years on the staff of the Senate Subcommittee on Internal Security. From 1959 until the end of 1970 he was attached to the staff of the late Senator Thomas J. Dodd of Connecticut, the vice-chairman of the Subcommittee. In this position, his portfolio as a staff assistant embraced internal security, foreign policy, and national defense. From 1971 until the end of 1978, he was senior analyst for the Internal Security Subcommittee and wrote many of its reports, including its final report on "The Erosion of Law Enforcement Intelligence and Its Impact on the Public Security." He is the author of two books on wartime Yugoslavia and of many articles on foreign affairs and problems of internal security. His last book, published by the Hoover Institution Press, in 1978, was entitled, "Patriot or Traitor: The Case of General Mihailovich."

PREFACE

This monograph is the product of several years of continuing, if intermittent, research. The initial impetus for the study was provided by the alarming information on the state of the Federal Employee Security Program developed in the course of hearings held by the internal security unit of the Senate Subcommittee on Criminal Laws and Procedures in 1978.

The study is based in large degree on an extensive reading of the available literature and official documents. But the principal contribution came from numerous conversations with men (and two women) who have served in various capacities in the Federal Employee Security Program -- as investigators, as directors or recent directors or officials of the personnel security programs in federal departments and agencies, or as officials and recent officials of the FBI and the Department of Justice.

Copies of two previous drafts were submitted to the Office of Personnel Management (OPM) and the Department of Defense (DOD) for their comments and corrections. At the same time, copies were submitted for the review of a dozen or more old-time professionals, including high-ranking officials -- some of them current, some of them recent -- in various sectors of the Federal Employee Security Program. Needless to say, the OPM and the DOD do not endorse some of the estimates and opinions to be found in this paper. I am, however, encouraged by the fact that the old-time professionals who were consulted, without exception, expressed the conviction that the paper did not overstate the seriousness of the situation.

Without naming any of the many people who assisted me, I would like to thank them all for their patient acceptance of my many heavy demands on their time.

EXECUTIVE SUMMARY

[Because this monograph does not lend itself to summarization on a chapter-by-chapter basis, the following summary is limited to some of the highlights of the study plus the final recommendations.]

1. The need for a personnel security program is accepted in principle by all members of Congress, liberals as well as conservatives, because of the extensive national and international experience with Soviet espionage and infiltration.

2. However, over the past two decades, and in particular over the past five years, there has been a serious erosion affecting all aspects of the Federal Employee Security Program. In most government departments, very little is left of the loyalty-security program originally spelled out by President Truman in Executive Order 9835 (March 1947) and rewritten by President Eisenhower in Executive Order 10450 (February 1953), which established a government-wide loyalty and suitability program. What is left is essentially a suitability program, tailored to weed out applicants who are lacking in competence or deficient in character or are unacceptable because of serious criminal history records, but possessing very little relevance to the task of weeding out those whose activities or associations pose a danger to the national security.

- There is no domestic intelligence base against which the names of applicants can be checked.
- Cooperation is frequently not forthcoming from state and local offices and from the private sector.
- There are no national security criteria for the guidance of investigators and administrators.
- In the 44 government departments and agencies serviced by the Office of Personnel Management, "mere membership" in the Communist Party, the KKK, and other subversive organizations on both sides of the spectrum is not a bar to federal employment, even in sensitive positions. To disqualify an applicant, there must be evidence of an overt act or of plans to engage in such an act.

3. The situation is the product of a complex of developments, involving both Democratic and Republican administrations, decisions of the Supreme Court, Acts of Congress -- in particular the Privacy Act and the Freedom of Information Act of 1974 -- and arbitrary rulings by the Civil Service Commission putting the most restrictive interpretation on court decisions and the requirements of privacy legislation. Another factor is the widespread tendency when economies have to be effected, to put personnel security at, or near the bottom of, the priority totem pole. Still another factor is the anti-intelligence hysteria in the wake of Watergate.

4. The Destruction of the Domestic Intelligence Data Base: In the old days, applicants for federal employment were routinely checked against (1) the files of the FBI; (2) the personal reference card system maintained by the Security Research and Analysis Office (SRAS) of the Civil Service Commission (CSC); (3) the extensive domestic intelligence records maintained by state and local agencies; (4) the files of the House Internal Security Committee (previously the House Un-American Activities Committee). But the priceless reservoir of domestic security intelligence at state and local levels has for the most part been destroyed or locked up; the FBI has for all practical purposes been out of the domestic intelligence business since 1976; and the SRAS and the House Internal Security Committee no longer exist.

5. The Chilling of Public Cooperation: Until the mid-seventies, the Civil Service Commission could count on the complete cooperation of federal, state and local agencies and a very high degree of cooperation from private citizens and institutions and corporations. Today many state and local jurisdictions do not cooperate at all because of the Privacy Act and Freedom of Information Act, and private citizens, all the way up to federal judges, frequently refuse to cooperate if they have adverse information because, under the Privacy Act, OPM can no longer guarantee confidentiality.

6. The Phasing Out of the FBI's Domestic Security Rule: The FBI, which used to be the principal agency involved in making the National Agency Checks on applicants, has largely withdrawn from the domestic security field since the imposition of the restrictive 1976 guidelines. In 1974 the FBI opened or re-opened over 55,000 cases on subversives and extremists. By October 1977 only 130 individuals and 17 organizations were under domestic intelligence investigation. According to a Treasury Department report, the number of active investigations is even lower today.

In 1967 the CSC referred the cases of 2,223 applicants to the FBI for full field investigations because preliminary evidence based on National Agency Checks (NAC's) had turned up information bearing on the national security. By 1977 the number was down to 81. The author was told that the last full FBI field investigation of a NAC conversion was conducted in 1978.

7. Self-Inflicted Restrictions: In 1975 the Civil Service Commission ruled, based on its interpretation of the Privacy Act, that questions relating to loyalty had to be eliminated from application for federal employment in non-sensitive positions. In 1976, this ruling was extended to cover sensitive positions as well. The upshot of this is that "mere membership" in the Communist Party or the KKK or a broad range of other extremist organizations is no longer regarded as a bar to federal employment, even in sensitive positions. To be barred, there must be some overt act.

8. Cutting the Costs of Personnel Security: Serious damage has also been done by the tendency -- on the part of Congress as well as of most government departments -- to assign very low budgetary priority to their personnel security programs. When cuts have had to be made,

the personnel security divisions have generally suffered more than other divisions. Several examples:

- In 1965, the Civil Service Commission eliminated the requirement for full field investigations for noncritical sensitive positions (which have access up to Secret).
- The Department of Health and Human Services, with 170,000 employees, has had its personnel security division reduced to a staff of three, as against 333 investigators and staff assistants in its Civil Rights division.
- In 1976, Congress mandated a 27-percent cut in the personnel of the Defense Investigative Service, which processes personnel investigations for the Department of Defense. By June 1 of this year, this had resulted in a backlog of 83,000 investigations. According to the DOD, this backlog was having a serious adverse effect on operational readiness and defense production. The Government Accounting Office estimated that the backlog might be costing the DOD almost \$1 billion a year, and strongly urged that the DIS be provided with 888 additional staff. Some progress has been made in reducing the backlog, but the situation still remains serious.
- Although the NACI (National Agency Check with Inquiries) still remains the minimal investigation for employees in non-sensitive and noncritical-sensitive positions, it is now being proposed, in the interest of economy, that employees in non-sensitive positions (1,098,166 out of 1,652,083 positions surveyed) be subjected only to a NAC. The saving effected would be approximately \$11.00 per applicant (\$36.29 against \$29.05). This would be a highly questionable procedure, because without written inquiries to reinforce the National Agency Check, the employing agency would not even be able to confirm that the applicant is who he says he is.

The continuing pressure to economize at the expense of the employee security program makes no sense. The total cost of the program, government-wide, is probably under \$200 million per year. In the author's opinion, double this amount would not be too high a price to pay for an effective personnel security program.

B. The Waiver of Pre-employment Field Investigations for Sensitive Positions: From a personnel security standpoint, one of the most dangerous practices that has established itself over the past two decades is the widespread resort to the waiver of full field investigations prior to filling critical-sensitive positions with applicants or appointees.

Executive Order 10450 provided for the use of such waivers only "in case of emergency"; in each case the head of the agency had to approve the appointment as "necessary in the national interest," and the Background Investigation had to be undertaken without further delay. A majority of the agencies apparently now feel that the cost of leaving such positions

unfilled for several months outweighs any risk that may be involved in a post-appointment investigation. A survey of 11 agencies conducted in mid-1980 by the OPM revealed that most investigations were now being processed on a post-appointment basis. Only two of the agencies reported pre-appointment waivers in less than 34 percent of the cases. Seven of them reported such waivers in 90 to 100 percent of the cases.

The waiver of pre-employment field investigations has been strongly and repeatedly criticized as a bad security practice by the Department of Justice and the CSC/OPM. The various departments and agencies appear to have shrugged off these repeated criticisms and moved ahead to make the waiver their procedural norm. This is a situation which must somehow be reversed.

RECOMMENDATIONS:

1. The two central requirements for the implementation of an effective Federal Employee Security Program are (i) the establishment of guidelines for agency directors, adjudicators and investigators; and (ii) the reconstruction of a domestic intelligence data base by reactivating the FBI in the field of domestic intelligence and reviving the OPM's Security Research and Analysis Section.

2. The OPM should carefully examine the series of restrictive directives promulgated by the Civil Service Commission over the past decade with a view to promulgating new directives which have the effect of nullifying at least the more questionable ones.

3. The OPM and the Justice Department must team up to represent the interests of the Federal Employee Security Program before the courts far more vigorously and effectively than they have heretofore been.

4. The Freedom of Information Act and the Privacy Act will have to be amended in a manner which exempts from disclosure information provided to the federal agencies in connection with the investigation of applicants and appointees for federal positions. Due process can be observed when applicants are rejected by providing them (i) with a summary of derogatory information responsible for the decision and inviting their response; and (ii) the right of appeal.

5. The investigative staff must be enlarged, and investigators and adjudicators must be given more intensive training.

6. Individuals who are denied employment on national security grounds should not be stigmatized as loyalty risks or security risks. Instead, the determination should simply state that the applicant has been found "unsuitable" for federal employment.

7. The Federal Torts Claims Act should be amended to provide relief from personal liability to investigators, adjudicators and administrators if they have acted in good faith.

8. Legislation should be considered which would make mandatory the cooperation of state and local authorities with the DOD and other government agencies in the matter of personnel investigations related to the Federal Employee Security Program. The possibility of compensating state and local agencies should also be considered.

9. A blue ribbon panel similar to the Lloyd Wright Commission of the 50's should be set up to look at the entire question of the personnel security situation.

10. In order to provide a lead and set the tone for all government departments and agencies, President Reagan should speak out on the issue and promulgate, in the form of an Executive order, rules facilitating the restoration of the program.

The Constitution does not guarantee public employment. City, State, and Nation are not confined to making provisions appropriate for securing competent professional discharge of the functions pertaining to diverse governmental jobs. They may also assure themselves of fidelity to the very presuppositions of our scheme of government on the part of those who seek to serve it. No unit of government can be denied the right to keep out of its employ those who seek to overthrow the government by force or violence, or are knowingly members of an organization engaged in such endeavor.

Justice Felix Frankfurter, in the
case of Garner v. Board of Public
Works of City of Los Angeles,
341 US 716, 724-725, 1951

THE NEED FOR A PERSONNEL SECURITY PROGRAM

The need for a personnel security program is accepted in principle by virtually all members of Congress, by liberals as well as by conservatives. In practice, however, this acceptance has, over the past decade or more, been rendered meaningless by the one-sided insistence on the right of privacy. The right of privacy is very important -- but it is not the only right. The government also has rights -- and one of the most important of these is the right to protect itself and the public against subversion and terrorism and domestic violence. The exercise of this right of self-protection undeniably conflicts at certain points with the right of privacy, or, to be more precise, with the absolutist conception of the right of privacy. This is so for the simple reason that it involves such procedures as personnel investigations and the maintenance of an effective domestic intelligence operation and domestic intelligence files. Common sense points to the need for a reasonable compromise between the right of privacy and the right of the government to take measures to protect the security of the nation. Instead, a situation has now been created in which the right of privacy is overwhelmingly paramount, while the personnel security program essential to the protection of the nation has been reduced to a fragmentary and moribund condition which bodes no good for the future.

The entire history of the post World War II period, both in this country and in the western European countries, is filled with incidents which dramatically demonstrate the need for rigorous personnel security practices designed to protect our government from the risks inherent in employing in positions of responsibility either people of questionable character or stability -- of whom there are many -- or people who are ideologically committed to the destruction of our form of government. The latter constitutes only a tiny fraction of the population, but they are capable of inflicting enormous damage if they move into sensitive positions in government.

In the late 1940's and early 50's, as a result of the revelations of Whittaker Chambers, Elizabeth Bentley and Hedda Massing, the American public learned that some forty people who held high positions in the United States government and international agencies were, in fact, Soviet agents. The roster of revealed agents included Alger Hiss, who had served as Assistant Secretary of State for International Organization Affairs; Harry Dexter White, Assistant Secretary of the Treasury under Morgenthau; Lauchlin Currie, Executive Secretary to President Roosevelt; Larry Duggan, head of the State Department's Latin American Division; and Frank Coe, another top Treasury employee who later became head of the International Monetary Fund.*

* Of the government officials named above, only Alger Hiss went to prison. The essence of the case against him had to do with treason, but because of the statute of limitations he was charged with having perjured himself in denying that he had transmitted secret State Department documents to Whittaker Chambers, a confessed Soviet courier. Harry Dexter White appeared once before the House Unamerican Activities Committee. -- and then died of a heart attack before his second scheduled appearance. Subsequently, both Attorney General Brownell and J. Edgar Hoover made statements indicating that they regarded the case against Harry Dexter White as ironclad. Lauchlin Currie, when asked to appear before the Senate Internal Security Subcommittee in 1952, went to Colombia and has never returned to the United States since that time. Larry Duggan, who had been asked to testify before the Senate Subcommittee at about the same time, fell from a New York skyscraper window under mysterious circumstances. Frank Coe invoked the Fifth Amendment when he was asked, "Are you a Soviet agent, Mr. Coe?". He was immediately dismissed by the International Monetary Fund. Shortly thereafter he went to Red China where he served as a financial advisor to the government until his death last summer.

Since these early revelations were made, there has been a steady succession of cases -- less spectacular, perhaps, but nevertheless highly important -- involving disloyalty and espionage by United States government employees. A random selection from a much longer chronological compendium of such cases reminds us that Irvin Chambers Scarbeck, second secretary of the U.S. Embassy in Poland, was sentenced to thirty years in November 1961 on a charge of espionage; that Nelson C. Drummond, a U.S. Navy enlisted man, was sentenced to life imprisonment in August 1963 on a similar charge; that Sgt. Robert C. Johnson was sentenced to twenty-five years in July 1965; that William Henry Whalen, a retired lieutenant colonel, was sentenced to fifteen years in March 1967; that Edwin Gibbons Moore II, a retired CIA employee, was sentenced to life imprisonment in June 1977 on a charge of espionage; that Christopher John Boyce, a TRW contract employee, was sentenced to forty years in prison in December 1977 for passing sensitive information about our reconnaissance satellites to the Soviets; that in November 1978, William Kampiles, a minor CIA employee who got his hands on a priceless manual on the KH 11 satellite (designed to monitor Soviet SALT violations) and sold it to the Russians, was also sentenced to forty years in prison. As this study is being completed, there is pending before a U.S. Air Force Court Martial the case of 2nd Lt. Christopher M. Cooke, who stands accused of passing on to the Soviets highly classified information to which he had access as the deputy commanding officer of a Titan missile site.

There were other traitors who held important positions who could not be sentenced to prison because they managed to get away before the law could catch up with them. Thus, in the summer of 1960, two employees of the super secret National Security Agency, Bernon F. Mitchell and William H. Martin, defected to the Soviet Union, gave away vital technical knowhow on U.S. coding and decoding capabilities and procedures, and lent themselves to a sustained and malicious

propaganda campaign against the United States. And we are currently confronted with the case of Philip Agee who resigned from the CIA in 1968, based on the conviction that he had become a "servant of the capitalism I rejected." Since that time, making no bones about the fact that he considers himself a Marxist, he has been devoting himself to undercutting the CIA and publicly identifying its agents.

This partial listing could be expanded many times over.

The other western nations have similarly been shocked from time to time to discover that men who held high positions in their governments at different times were in reality Soviet agents. England received its first shock from the case of Klaus Fuchs, a top ranking nuclear scientist, who passed on vital information about the H bomb to the Russians. Years later it was shocked to learn that Kim Philby, the head of British counterintelligence, was also a Soviet agent -- as were his confederates, both high ranking officers in the Foreign Service, Guy Burgess and Donald MacLean. All three defected to the Soviet Union before they could be apprehended. In Germany in recent years there have also been many instances of espionage by people who held important government positions, the best known of which was the case of Guenther Guillaume, a personal secretary to Chancellor Willy Brandt.

Even neutral countries have not escaped the attention of the KGB. In Sweden in 1964, there was the sensational case of Colonel Stig Wennerstroem, a retired air force colonel who had served from 1952 to 1957 as air force attache in Washington. Wennerstroem was convicted on the charge that he had supplied information to the Russians continuously from 1948 to 1963 and had gravely compromised Sweden's national defense. Neutral Switzerland went through a similar experience in 1976 when Brigadier General Jean-Louis Jeanmarie, a member of the military general staff, was convicted of spying for the Russians for 18 years, massively compromising Switzerland's defensive preparations.

It would be difficult to place a dollar figure on the total damage done to the interests and defenses of the western nations by Soviet agents such as those we have named. Sweden is reported to have spent in excess of one hundred million dollars in reorganizing its defenses as a result of the Wennerstrom revelations. The Jeanmarie case is reported to have cost Switzerland a comparable sum of money. Harry Dexter White cost the American taxpayers at least one billion dollars when -- over the opposition of the War Department, the State Department and the Bureau of Engraving and Printing -- he pushed through his personal recommendation that the Soviets be provided with duplicates of the American printing plates for German occupation currency. Much more important, however, in White's case is the fact that, through the Morgenthau Plan* of which he was the author, he was able to serve the Soviet objective of keeping Germany in the war as long as possible so that the Red Army would have more time to push to the west in Europe.

On the basis of this long and dismal record involving both the U.S. and its allies, it should not be necessary to defend the proposition that all those employed by the U.S. government, especially in sensitive positions, should undergo careful scrutiny before they are approved for such employment.

* The Morgenthau Plan, in essence, called for the deindustrialization of Germany and its conversion into a pastoral country. It was strongly opposed by both the War Department and the State Department because it undercut the position of those Germans who wanted to end the war, many of whom were in contact with our own intelligence. In July of 1944, indeed, anti-war sentiment at high level resulted in the attempted assassination of Hitler by Count von Stauffenberg, an incident which was followed by hundreds of executions and the forced suicide of General Rommel. The Morgenthau Plan was used by Hitler to bolster his position. The Nazi press depicted it as a Jewish-American plan for the permanent impoverishment of Germany. Governor Thomas Dewey made the statement that the plan was worth ten new divisions to Hitler. Obviously, if the anti-Nazi Germans had been able to overthrow Hitler and make peace in the fall of 1944, scores of thousands of lives would have been saved and the war would have ended with the Soviets hundreds of miles to the east of where they finally stood on VE Day in May of 1945. The Morgenthau Plan foreclosed any such possibility.

Even the best implemented personnel security program cannot screen out all those who might be recruited as mercenary agents because of character deficiencies or because there is something in their background or their life mode which makes them subject to blackmail. Nor can it screen out all those with political sympathies that might make them ideological moles in whatever agency they are employed. (It should perhaps be noted parenthetically at this point that, while mercenary agents are far more numerous than ideological agents, the latter are particularly dangerous because, when they rise to high office in government, they can manipulate foreign policy in the manner of Alger Hiss and Harry Dexter White, or can seriously sabotage operations, in the manner of Kim Philby. Even in lesser positions they can do grave damage by suppressing or doctoring information which comes across their desks, by tampering with military computers, or by sabotaging other high technology equipment.)

It is reasonable to assume, however, that many undesirable elements who might otherwise find their way into government employment can be kept out by a soundly conceived program which establishes appropriate levels of investigation for sensitive and ultra-sensitive positions on the one hand, and for the great mass of non-sensitive positions on the other hand.

It is the difference between a boxer having his guard up and dropping his guard. With his guard up, he will be able to stop some of the blows -- many of them if he is skillful. With his guard down, he will be able to stop none of them. In the field of personnel security in recent years, our guard has been completely down, or almost completely down. It is imperative that we get it up again because we are living through a critical world situation, confronted by foes who command the most massive machinery of espionage, infiltration and disinformation the world has ever known.

THE ANATOMY OF THE FEDERAL EMPLOYEE SECURITY PROGRAM

Prior to 1939, the criteria governing the employment of applicants by federal departments and agencies had to do essentially with general suitability -- primarily the factors of competence and personal integrity. This was the thrust of the Civil Service Act of 1883, which was the first in a long series of Congressional enactments bearing on the problem of employability. In line with this, civil service investigations prior to 1939 were as a rule limited to questions of character and general suitability.

The Hatch Act of 1939 was the first law which dealt specifically with the question of loyalty. Section 9A prohibited federal employees from "membership in any political party or organization which advocates the overthrow of our constitutional form of government in the United States." Over the intervening years it has been followed by a progression of Executive orders and acts of Congress which led to the emergence in the mid-50's of a formalized and effective loyalty-security program.

After the Hatch Act, there was President Roosevelt's Executive Order 8781 of June 12, 1941, which required the fingerprinting of all employees in the executive civil service. In the spring of 1944, the Civil Service Commission established a Loyalty Rating Board to handle cases involving derogatory information with regard to loyalty. About the same time, the Civil Service Commission began compiling a security index and general information file. In November 1946 President Truman issued an Executive order establishing a Temporary Commission on Loyalty. Based on the Commission's report, President Truman on March 2, 1947 promulgated Executive Order 9835, which stipulated that employment in the executive departments or agencies could be refused if "...on all the evidence, reasonable grounds exist for the belief that the person involved is disloyal to the government of the United States." EO 9835 was superseded in February of 1953

by Executive Order 10450, signed by President Eisenhower, which basically broadened the loyalty program to include suitability. It is EO 10450, as amended, that governs the employee security program today in the competitive civil service.

EO 10450 said that --

...the interests of the national security require that all persons privileged to be employed in the departments and agencies of the government shall be reliable, trustworthy, of good conduct and character and of complete and unswerving loyalty to the United States.

It called upon the head of each department and agency of the government to establish and maintain "an effective program to insure that the employment and retention in employment of any civilian officer or employee...is clearly consistent with the interests of the national security."

It stipulated that the employment of civilian officers or employees in government agencies and departments should be made subject to investigation, the scope of the investigation to be regulated "according to the degree of adverse effect the occupant of the position...could bring about, by virtue of the nature of the position, on the national security."

It required the heads of departments and agencies to designate as sensitive any position where the occupant would be in a position to bring about "a material adverse effect on the national security." It also stipulated that any position designated sensitive "shall be filled or occupied only by a person with respect to whom a full field investigation has been conducted," and that "in no event shall the investigation include less than a National Agency Check, including a check of the fingerprint files of the Federal Bureau of Investigation and written inquiries to appropriate local law enforcement agencies, former employers and supervisors, references and schools attended by the person under investigation."

It gave to the Civil Service Commission the primary responsibility for

conducting investigations of persons entering or employed in the competitive service.

In deciding whether the employment or retention in employment of a person being investigated was "clearly consistent with the interests of the national security," EO 10450 listed the following criteria for the guidance of investigators.

1. Depending on the relation of the government employment to the national security:

- (i) Any behavior, activities, or associations which tend to show that the individual is not reliable or trustworthy.
- (ii) Any deliberate misrepresentations, falsifications, or omissions of material facts.
- (iii) Any criminal, infamous, dishonest, immoral, or notoriously disgraceful conduct, habitual use of intoxicants to excess, drug addiction, or sexual perversion.
- (iv) An adjudication of insanity, or treatment for serious mental or neurological disorder without satisfactory evidence of cure.
- (v) Any facts which furnish reason to believe that the individual may be subjected to coercion, influence, or pressure which may cause him to act contrary to the best interests of the national security.

2. Commission of any act of sabotage, espionage, treason, or sedition, or attempts thereat or preparation therefor, or conspiring with, or aiding or abetting, another to commit any act of sabotage, espionage, treason, or sedition.

3. Establishing or continuing a sympathetic association with a saboteur, spy, traitor, seditionist, anarchist, or revolutionist, or with an espionage or other secret agent or representative of a foreign nation whose interest may be inimical to the interests of the United States, or with any person who advocates the use of force or violence to overthrow the government of the United States or the alteration of the form of government of the United States by unconstitutional means.

4. Advocacy of use of force or violence to overthrow the government of the United States, or of the alteration of the form of government of the United States by unconstitutional means.

5. Membership in, or affiliation or sympathetic association with, any foreign or domestic organization, association, movement, group, or combination of persons which is totalitarian, Fascist, Communist, or subversive, or which has adopted, or shows, a policy

of advocating or approving the commission of acts of force or violence to deny other persons their rights under the Constitution of the United States, or which seeks to alter the form of government of the United States by unconstitutional means.

6. Intentional, unauthorized disclosure to any person of security information, or of other information disclosure of which is prohibited by law, or willful violation or disregard of security regulations.

7. Performing or attempting to perform his duties, or otherwise acting, so as to serve the interests of another government in preference to the interests of the United States.

With minor modifications these criteria still govern -- theoretically -- the operation of the federal employee security program.

In its second paragraph, EO 10450 underscored the need for fairness, impartiality and equitable treatment and for the adjudication of cases by mutually consistent standards between government departments and agencies.

Since 1967 all civilian positions in the competitive service have been divided into three basic categories -- nonsensitive, noncritical-sensitive and critical-sensitive.

The Federal Personnel Manual defines sensitive positions as "those positions the occupants of which could bring about, by virtue of the nature of their positions, a material adverse effect on the national security." It makes it mandatory to classify positions as sensitive if the occupants will have access to Top Secret, Secret or Confidential information.

The Personnel Manual defines critical-sensitive positions by positing these criteria:

- Access to TOP SECRET defense information;
- Development or approval of war plans, plans or particulars of future or major or special operations of war, or critical and extremely important items of war;
- Development or approval of plans, policies and programs which affect

the overall operations of an agency; that is, policy-making or policy-determining positions;

- Investigative duties, the issuance of personnel security clearances, or duties on personnel security boards;
- Fiduciary, public contact or other duties demanding the highest degree of public trust.

Noncritical-sensitive positions are defined as all other sensitive positions which do not meet the above criteria.

The Office of Personnel Management (OPM), previously the Civil Service Commission (CSC), conducts the National Agency Checks (NAC's) for almost all government agencies. The NAC involves a check of the fingerprint and investigative files of the FBI, the files of the OPM, the files of the appropriate intelligence and investigative agencies and, if the applicant has served in the armed forces, with the records of the appropriate service. It also used to involve a check with the personal reference card files maintained by the Security Research and Analysis Section of the CSC/OPM, the files of the House Internal Security Committee, and the domestic intelligence files of state and local law enforcement agencies. These sources, however, are no longer available to the Federal Employee Security Program. (This will be discussed in detail at a later point.)

In the case of nonsensitive and noncritical-sensitive positions, the NAC, as required by EO 10450, is supplemented with written inquiries to references, schools, former employers, local police departments, etc., and the entire procedure is then called a NACI. The inquiries are important among other reasons because they help to establish that the subject is who he says he is. The NACI is the minimum investigation conducted for federal employment by the OPM. However, enlistees in the armed forces undergo a somewhat abbreviated investigation called an ENTNAC, which is a NAC without an FBI fingerprint check.

In the case of critical-sensitive positions, the NAC is combined with a full

field Background Investigation, which involves record checks and personal interviews with neighbors, friends, references, employers, schools, business associates and others who have general knowledge of the subject, as well as law enforcement agencies. It also generally involves a credit check.

Operationally, the Federal Employee Security Program is divided into three distinct sectors: the Department of Defense (DOD), including the armed forces; the fifty-four federal departments and agencies whose investigative programs come under the direct authority of the GPM; and the law enforcement and intelligence agencies. The State Department, as an intelligence-using agency, would be in this last category.

Because of its size and the massive annual turnover in the armed forces, DOD accounts for the bulk of personnel security investigations -- some 900,000 in 1978 out of a total of 1.4 million.* The great majority of these investigations are NAC's or EYNAC's, but about 120,000 are BI's or Special BI's.

The Civil Service Commission in the same year conducted some 325,000 personnel security investigations, while the remaining 175,000 were conducted by the Departments of Justice, State and Treasury and by the CIA.

There are several qualifications that have to be made to the above description of the division of labor in the personnel security field. Executive Order 10450 had given the CSC the authority to conduct investigations of applicants for employment throughout the civilian sector, including the civilian sector of DOD. Under a rather complex arrangement -- which makes for divided responsibilities -- the CSC has delegated to the Department of Defense the

* Search Group, Inc., Federal Access to State and Local Criminal Justice Information for Federal Personnel Security and Employment Suitability Determinations, Sacramento, California. March 1979.

responsibility for conducting Background Investigations of its own civilian employees, and there have been similar delegations of authority in the case of the intelligence and law enforcement communities. A number of the agencies and departments which conduct most of their own BI's (e.g., Treasury Department, State Department and the National Security Agency) still call on the GPM to assist in the processing of some of the less important positions requiring Background Investigations.

Such an anatomical description of the Federal Employee Security Program ^{reasonably} makes it sound like a neat and orderly operation. Unfortunately, it provides no clue to the true state of affairs.

THE DEGRADATION OF THE FEDERAL EMPLOYEE SECURITY PROGRAM

Over the past two decades, and in particular over the past five years, there has been a progressive retreat from the entire concept of personnel security in government. In most government departments, very little is left of the personnel security program, properly speaking. What does remain of it is essentially a personnel suitability program, capable in many cases of weeding out applicants who are lacking in competence or deficient in character or are unacceptable because of serious criminal history records. It is virtually incapable, however, of weeding out applicants who have ties or associations that constitute a threat from a national security standpoint, or are clearly inconsistent with the national interest.

Testifying before the Senate Subcommittee on Criminal Laws and Procedures in 1978, Mr. Alan K. Campbell, Chairman of the Civil Service Commission, stated that applicants could not be denied employment in the federal competitive service on the basis of what is called "mere membership" in subversive organizations of the far left or the far right -- including the Communist Party, the Socialist Workers' Party (SWP), the KKK, the American Nazi Party, the

Palestine Liberation Organization (PLO), and the Puerto Rican Socialist Party (a frankly Castroite organization) and the several Maoist organizations. For employment to be denied, there had to be knowing membership plus some overt act.

In line with this, the Civil Service Commission in 1977 took the stand that applicants for employment, even in sensitive positions, could not be asked about membership in organizations committed to the violent overthrow of the United States government or to the use of force for political change; nor, in the absence of an overt act, could information about such membership coming from a third party source be entered into the record of the investigation.

This was confirmed by Mr. Robert J. Drummond, Jr., Director of the CSC Bureau of Personnel Investigations, in the course of a 1978 appearance before the Senate Subcommittee on Criminal Laws and Procedures, in the following exchange:

SENATOR THURMOND: And you would not maintain in your files the information that a man is a member of the Communist Party or any organization that stands for the violent overthrow of our government. Mere membership would not be enough to allow you to put that in your files -- you would have to have some overt act?

MR. DRUMMOND: Yes. We would have to have something more than mere membership.

The absolute ban on investigation into what is euphemistically called "mere membership" was reflected in the following paragraph taken from a 1978 handbook for Civil Service Commission investigators:

Members of an organization are reported to have set fire to the campus ROTC building. If the subject of investigation is reported to be a member of this group, our inquiry would be limited to his/her activities, if any, in connection with the act of arson.

These were the rules which were passed on when the Civil Service Commission was renamed as the Office of Personnel Management (OPM) on January 1, 1979.

Such self-imposed restrictions are crippling enough by themselves. They served to exacerbate the basic damage done by the virtual destruction of the intelligence data base on subversive and violence-prone organizations, and by the catastrophic effect that privacy legislation and the 1976 FBI guidelines

have had on the ability of federal agencies to maintain records or to obtain information from state, local and private sources, or even from other federal agencies.

The basic ruling that applicants cannot be asked about membership in subversive organizations stands to this day, although it must be noted that, thanks to a change in management, there have since the end of 1979 been some significant changes for the better, so that today investigators when interviewing third parties are permitted to ask about membership in questionable organizations and permitted to report any such statements by witnesses in their own words. The Investigators' Handbook quoted above has now been replaced by a new handbook which avoids such inane instructions. In addition, the conditions justifying denial of employment have been redefined so that, in theory, employment may be denied on the basis of membership in a subversive organization (1) if it is knowing membership, and (2) if it can be established that the applicant has a specific intent to further the unlawful aims of the organization. This limited progress is to be welcomed. But it is completely ineffective in counterbalancing the near-total absence of a domestic intelligence base and the total absence of guidelines.

Another factor contributing to the degradation of the Federal Employee Security Program is the fact that investigators, analysts and administrators concerned with personnel security have been compelled for some years now to operate without accepted criteria and guidelines.

The situation existing today in effect nullifies long-standing and repeated legislative requirements. It also makes a mockery of the provisions of Executive Orders relating to personnel security in government promulgated by President Truman in 1947 and by President Eisenhower in 1953. It flies in the face of a whole series of Supreme Court decisions

which are in essential harmony with Justice Frankfurter's statement quoted above, in upholding the constitutionality of measures designed to "safeguard the public service from disloyalty."

Court Rulings and Self-Imposed Restrictions

The series of circumstances and decisions that brought the Federal Employee Security Program to its present lamentable state cannot be attributed to any single agency or any single Administration. It is the product of a complex of developments, involving both Democratic and Republican administrations, decisions of the Supreme Court, Acts of Congress, in particular the Privacy Act and the Freedom of Information Act of 1974, and arbitrary rulings by the Counsel for the Civil Service Commission, putting the most restrictive interpretations on Supreme Court decisions and other court decisions and on the requirements of the privacy legislation. It is also a product, as will be discussed later, of the widespread tendency to put personnel security at or near the bottom of the priority totem pole. Finally, it is a product of widespread misunderstanding of the nature and purpose of the federal personnel security program, a misunderstanding which tends to equate it with "witch-hunting" and "McCarthyism."

The criticism has been made that EO 10450 is out of date and that it requires amendment or even rewriting in order to make it a viable administrative and legal instrument. However, subject to certain changes suggested by Supreme Court decisions, it still remains the law of the land, no matter what weaknesses it may suffer from, and the guiding authority for the various executive agencies in the conduct of their own employee security program.

The Eisenhower Executive Order had been preceded in 1950 by Public Law 733, 81st Congress, which dealt primarily with the problem of applicants and employees who "although loyal to the United States, act in a manner which jeopardizes national security, either through wanton carelessness or general disregard for the public good." The House report from which this quote was taken also pointed out that "the bill makes ample provision for the employment in nonsensitive agencies of

certain of those employees who may be classified in sensitive departments and agencies as security risks."

At the time Executive Order 10450 was promulgated, the situation seemed clear enough. Nor was there any significant partisan division within Congress.

However, over the ensuing period there were several developments that served to weaken Executive Order 10450 and restrict its application.

In 1956, the Supreme Court (Cole v. Young, 351 US 536) found that, while the term "national security" was not defined in the Act of August 26, 1950, it was intended to comprehend "only those activities of the government that are directly concerned with the protection of the nation from internal subversion or foreign aggression," and that membership in a Communist or other subversive organization did not fall within the dismissal procedures set forth by Executive Order 10450, unless the employee in question occupied a "sensitive" position. The Court accordingly ordered the reinstatement of Cole as a food and drug inspector for the Department of Health, Education and Welfare.

In thus interpreting the intent of Congress, the Supreme Court stated that its construction was limited to the Act of 1950 and was not directed at Executive Order 10450. Despite this disclaimer, however, it was inevitable that Cole v. Young would have a highly chilling effect on the future implementation of 10450.

The Court's decision brought a storm of protest from Congress. As Thomas Murray, an influential Democrat, later put it, there never had been any indication that "any member of the Committee or the House felt that its provisions were limited to so-called sensitive positions." Francis E. Walter, a senior member of the House Judiciary Committee, said in anger, "It was intended by the Congress to make it possible to get rid of a person, no matter what job he had, if that person was a part of this conspiracy to destroy this government.... We intended that we were going to rid ourselves in the government of this kind of employee.

The case of Cole v. Young in my judgment is the most striking example of the invasion by the Court of the legislative prerogative that I have seen in many years."

The Court's decision nevertheless had a far-reaching and many-sided impact. In its wake, the federal agencies were compelled to restore 109 dismissed employees to their positions and to award some \$579,000 in back pay. It has been noted that since the time of this decision there have been virtually no dismissals on loyalty grounds with respect to nonsensitive positions -- this despite the fact that such positions constitute over 95 percent of the total civilian federal work force.

A second important restriction on the original intent of EO 10450 resulted from a letter written on November 18, 1965 by John W. Macy, Jr., Chairman of the Civil Service Commission, to the heads of federal departments and agencies. The letter, which was written on the direction of President Lyndon B. Johnson, redefined sensitive positions by dividing them into critical-sensitive and non-critical-sensitive. Under EO 10450, full field investigations had been required for all sensitive positions. Under the Macy directive, full field investigations on a pre-appointment basis were required only with respect to persons considered for critical-sensitive positions.

In the aftermath of the Macy directive, there has been a sharp decrease in the number of applicants requiring full field investigations prior to their appointment for the simple reason that there are far more noncritical-sensitive positions than there are critical-sensitive positions. The division into critical-sensitive and noncritical-sensitive positions has its supporters even among those who favor a strong Federal Employee Security Program and are critical of many of the concessions that have served to weaken the program. Their argument is that each full field investigation conducted by OPM costs approximately \$1350 (as of July 1981), and we must, in the interest of economy in money and manpower, seek

to limit the number of full field investigations only to those positions where the national security could be jeopardized by a disloyal employee. The argument against this is that the loose noncritical-sensitive definition covers a tremendous amount of territory and, in some agencies -- including DOD -- involves access to Secret (but not Top Secret) documents. It should be noted that the Secret classification now covers a lot of extremely sensitive items because, as a result of President Carter's Executive Order of December 1978, the classification and handling of Top Secret documents were made so cumbersome that in a number of government departments many items which would in previous years have been given a Top Secret designation are today classified Secret in the interest of reducing the bureaucratic difficulties. [The Department of Defense states that there has been no downgrading of its own classification criteria because of the greater procedural difficulties.]

Compared with the annual salaries paid to occupants of noncritical-sensitive positions, a \$1350 expenditure at the outset for the purpose of assuring the government of an applicant's loyalty and integrity and general suitability for the specified position would appear to be a modest and prudent investment. And compared with the cost of national defense, the additional cost involved in such a procedure would be trifling.

The final point to be made is that from the standpoint of the ultimate cost to taxpayers, an enhanced personnel security program would probably pay for itself, in terms of insuring that the government obtains the best qualified candidates and in terms of giving the government ^{an additional measure of} protection against the infiltration of underworld elements and against the kind of fraud and other criminal diversionary activities that were rampant in the General Services Administration only a few years ago.

Another serious blow was struck at the Federal Employee Security Program by the Supreme Court's decision in Keyishian v. Board of Regents, handed down

on January 23, 1967. Executive Order 10450 made it clear that mere membership in a subversive organization was not a bar to government employment, that the membership had to be knowing membership. In Keyishian, the Court, in effect, ruled that mere knowing membership in a subversive organization was not enough to justify exclusion from government positions; it was also necessary to demonstrate that the subject had the specific intent to further the unlawful aims of the organization. This ruling imposes a formidable burden of proof on the government, even in cases where there is no contention about the fact of membership. The "Project 10" Report of February 1975* noted that "the difficulties of proof imposed by the courts in loyalty and security cases have proved almost insurmountable."

Justice Department and OPM officials with whom the author discussed the matter could not recall a single case since Keyishian where the government has attempted to deny employment on the basis of membership in subversive organizations -- even when the government was in possession of hard evidence of such membership. Instead, in a number of the most serious cases, it has had to resort to the subterfuge of finding some other suitability grounds to justify the denial of employment. In cases where the position involved was not critical-sensitive and the personal record of the applicant did not appear too outrageous, the tendency has been to pursue the path of least resistance.

The Supreme Court in its history has on more than one occasion reversed decisions taken by antecedent Courts when experience has demonstrated the inherent untenability of such decisions. There are few decisions on the books which call for reconsideration more urgently than the 1967 ruling in Keyishian v. Board of Regents.

* Domestic Council Committee on the Right of Privacy, Report, Vol. 2, Part 3, A Study Conducted by the Task Force on Personnel Investigations and Adjudication.

While the previous two decades have witnessed a significant weakening of the Federal Employee Security Program, over the past seven years a rapid succession of retreats has resulted in its near-total demolition. The Civil Service Commission played a key role in bringing about this succession of retreats. In September, 1975 the Commission closed down the extensive personal reference card system maintained by its security research and analysis section, against which all applicants were supposed to be checked under EO 10450. The reason given for the action was that it was probably in violation of the Privacy Act. In October 1976 it eliminated loyalty questions from application forms for employment in the federal civil service. This time the reason given was that "recent court decisions have prohibited routine inquiry into an individual's membership in certain organizations." This directive, however, had a caveat which permitted the asking of such questions where sensitive positions were involved. In a follow-up directive issued one year later, in October 1977, this caveat was cancelled in the case of sensitive positions because "the commissioners accepted the legal opinion of the Commission's General Counsel that Question 21 has a chilling effect on First Amendment rights and Question 22 is unconstitutionally vague."²

The question must be raised whether all the retreats ordered by the Civil Service Commission were really made mandatory by Supreme Court decisions and by the Privacy Act. For example, the November 12, 1973 memorandum which finally led to the elimination of questions dealing with organizational affiliations said that "recent decisions of the Supreme Court make it clear that mere membership in an organization that espouses the unlawful overthrow of the government may

* A detailed and documented account of these developments is to be found in a report entitled "The Erosion of Law Enforcement Intelligence and Its Impact on the Public Security" put out by the Senate Subcommittee on Criminal Laws and Procedures, in December 1978. The author of this paper was also the author of the report.

not be inquired into, and that the only fact of relevance is membership with knowledge of the unlawful purpose of the organization and with specific intent to carry out that purpose." But at the point where the Commission moved to eliminate all questions relating to membership in the Communist Party or other subversive organizations and issued rulings that even third parties could not be asked such questions about applicants for employment and that such information could not be incorporated in the investigative record if offered on a voluntary basis, the Commission was imposing an interpretation that went far beyond the requirements of the Supreme Court decisions. Before a determination can be made that an applicant for employment has been a knowing member of the Communist conspiracy, sharing a specific intent to carry out its purposes, it is clear that the fact of membership must first be established. The 1976-1977 CSC rules governing applications for federal employment made it impossible to arrive at such a preliminary determination. (As has been pointed out previously, OPM rules today do encourage investigators to inquire about membership in questionable organizations, but such questioning has limited impact because of the mayhem wrought on domestic intelligence and the absence of guidelines for government departments and agencies.)

It is to be noted that the Defense Department placed no comparable construction on the Supreme Court's decisions.

Similarly, without waiting to see whether the personal reference cards and security research files it had maintained could withstand legal scrutiny in the light of Privacy Act and Supreme Court decisions, the Civil Service Commission in 1975 moved to inactivate and seal its own security research files, basing itself on the advice of Counsel that this action was required by the Privacy Act. In so doing, the Commission greatly weakened its ability to alert dependent federal agencies to the existence of adverse information on applicants for employment, pointing to the need for full field investigations. This reduction

in its in-house capabilities was all the more damaging because of the increasing difficulty of obtaining information from local law enforcement agencies and institutions and because of the drastically diminished capabilities of the FBI in the field of internal security. Since then, all the reference cards and files of source documents have been boxed and placed in storage, and the entire Security Research and Analysis Section (SRAS), whose task it had been to compile and maintain these files, has been disbanded. With this matter we shall deal in more detail in a later section.

The Destruction of the Domestic Intelligence Data Base

From the standpoint of screening out elements whose employment might pose a danger to the national interest or national security, it is imperative that those responsible for administering the Federal Employee Security Program have at their disposal a domestic intelligence data base that would enable them to identify at least a substantial proportion of those applicants who are or have been associated with a broad variety of extremist and subversive or front organizations. These would include:

- organizations committed to the violent overthrow of the government
- organizations committed to the use of violence for political purposes
- organizations which conspire to deny civil rights to any group of American citizens
- organizations which operate under the control of or in collusion with hostile foreign powers
- organizations which serve as fronts or support organizations for any of the above categories.

In the 1950's and 1960's such a domestic intelligence data base did exist. It had three principal components. The first component was the very large body of domestic intelligence on file with the FBI. The second component consisted of the organization files and reference library and personal reference cards

maintained by the Security Research and Analysis Section of the Civil Service Commission. The third component of the national data base was the mass of detailed information on file with state and local law enforcement agencies, many of which had vigorous domestic intelligence programs. There were also two ancillary components of the domestic intelligence data base that should be mentioned.

First, there were the files of the House Internal Security Committee (formerly the House Unamerican Activities Committee). The files of the House Committee were regularly consulted by investigators for the Civil Service Commission in accordance with the requirements of EO 10450. Second, there were the domestic intelligence files on violence-prone and revolutionary groups in the custody of the U.S. Army. These files had their beginnings in the 1950's, when President Eisenhower used the Army repeatedly to enforce school desegregation in the southern states and the Army found it necessary to equip itself with intelligence about the KKK and other violent segregationist organizations and elements in order to discharge its duties. In the late sixties, the focus changed. Then it was a matter of dealing with mass rioting in the cities, organized subversion in the armed forces, and sabotage of the war machine and other illegal acts to impede the military by extremist groups in the anti-war movement. The Army's files were shared with other defense agencies which confronted similar problems, although they were not involved in the containment of the many devastating big-city riots.

Today all the components of the domestic intelligence data base have either ceased to exist or have for all practical purposes been lost as investigative resources available for the support of the Federal Employee Security Program.

The Department of Defense, bowing to strong Congressional consensus against military involvement in domestic intelligence, instructed the

services in March 1971 to terminate all domestic intelligence activities targeted against non-DOD personnel, and ordered their existing files destroyed.* The House Internal Security Committee was terminated in 1975.** The files of the Committee are in storage, where their usefulness is nil. The Security Research and Analysis Section of OPM has been completely closed down. The FBI and local and state law enforcement agencies have seen their capabilities in the field of domestic intelligence reduced almost to the vanishing point.

How did all this come about?

In the case of OPM, the erosion of its ability to contribute significantly to the personnel security process stems from the implications of the Privacy Act of 1974, the erosion of the domestic intelligence data base, and a series of self-imposed restrictions which we shall discuss later.

In the case of the FBI, the enactment of a far more stringent Freedom of Information Act of 1974 and the 1975-76 investigation by the Church committee on the Senate side and the Pike committee on the House side both resulted in

* In 1972, one year after the Defense Department discontinued all domestic intelligence activities and ordered its files destroyed, the Supreme Court, in Laird v. Tatum, upheld the constitutionality of the Army's domestic intelligence operation. While expressing some concern over the fact that Army investigative agencies were not subject to the "well-defined restrictions of the law and approval of the courts," the Supreme Court nevertheless said:

To quell disturbances and to prevent further disturbances the Army needs the same tools and, most importantly, the same information to which local police forces have access.... No logical argument can be made for compelling the military to use blind force. When force is employed, it should be intelligently directed, and this depends on having reliable information...in time.

The information gathered is nothing more than a good newspaper reporter would be able to gather by attendance at public meetings and the clipping of articles from publications available on any newsstand.

** The House had previously defeated by a wide majority a move by the Committee on Committees to eliminate the Committee on Internal Security. But then the Democratic Caucus circumvented the House vote by failing to include the Internal Security Committee in its report establishing the House committee structure for the session. This was not subject to amendment on the floor. Despite widespread indignation, the House voted to approve the report on committees because it had no practical alternative.

serious curtailment of the Bureau's internal security activities. But the final blow was the Domestic Security Guidelines issued in March 1976 by the then Attorney General, Edward Levi. Under these guidelines for the conduct of domestic intelligence operations, a full investigation could not be launched unless it was preceded by a "preliminary investigation" and then a "limited investigation." A "preliminary investigation" could be undertaken on the basis of allegation or information that an organization or an individual was engaged in, or was about to engage in, crimes of violence. These investigations, under the guidelines, were to involve the use of only the least intrusive techniques. If the "preliminary investigation" suggested the need for further information, FBI headquarters or the Special Agent in Charge was given the power to authorize, in writing, a "limited investigation." "Full investigations" could be authorized only by FBI headquarters on the basis of "specific and articulable facts," giving reason to believe that the individual or group was engaged or might be engaged in violations of the federal law involving the use of force or violence.

The guidelines limited a preliminary investigation to several months and a full investigation to one year -- a time limit which could be extended only on the written authorization of the Department of Justice.

There are some extremist organizations engaged in acts of violence or terrorism which meet the requirements for a full investigation under the Levi guidelines. Examples of such organizations would be the KKK, or branches of it, the Weather Underground, and the FALN, the major Puerto Rican terrorist organization. But there are far more organizations in the extremist spectrum that do not meet these criteria. Among these are groups like the Socialist Workers' Party (a Trotskyite organization), the Revolutionary Communist Party, the Progressive Labor Party, and a variety of other self-designated Marxist-Leninist groups, all committed to the forceful overthrow of the U.S. government and to working for its defeat in the event of war. None of these groups were found

to meet the Levi criteria because the ultimate crime to which they are committed may still be many years away; for the moment, they are simply engaged in organizing and propagandizing in support of this ultimate crime, fomenting subversion in the armed forces, and raising as much hell as they can in the industrial sector -- all activities which can invoke the protection of the First Amendment.

Also excluded by the Levi guidelines would be organizations such as the U.S. Peace Council, the American affiliate of the World Peace Council -- without question the most notorious and most effective of Moscow's international front organizations; the National Lawyers' Guild, which both House and Senate committees have described as a legal front for the Communist Party, but which has over the past two decades developed into a legal action group representing an array of radical left organizations and terrorists; and the North American Congress on Latin America (NACLA), whose slavish adherence to the Castro propaganda line throughout the Americas, supported by frequent direct contact with the Castro government and Castroite groups in other countries, raises serious questions of a domestic security nature. Ideally, the United States government should have at its disposal information about all of these organizations so that it would be in a stronger position to resist their efforts to infiltrate government agencies. Indeed, it is difficult to conceive of any agency administrator knowingly employing or appointing a person with such a background. But with no intelligence available and no criteria to guide administrators, the government can obviously offer no effective resistance.

It is not a matter of arguing that membership in front organizations should be treated in precisely the same way as membership in the Communist Party or other subversive organizations. There are numerous dupes and innocents who are in no way committed to the violent overthrow of the U.S. government and whom many would consider public-spirited citizens, who have permitted themselves to be

drawn into various front activities. Membership for a period of time in a single front organization is not today, and should not be, a bar to federal employment. But as Professor Sidney Hook once observed, while one may excuse membership in one or two front organizations on grounds of innocence, by the time an individual has served in twenty such organizations over an extended period of time, a pattern is established which exceeds the plausible boundaries of innocence. Active membership in a front organization is a legitimate personnel security consideration because it raises the question of whether it is part of a larger pattern.

The Levi guidelines, as was predictable, had an immediate and devastating effect on what remained of the FBI's domestic security program. In 1974, the FBI opened or reopened over 55,000 cases on "subversives and extremists," according to a GAO report. Two years later, the GAO reported that "as of early October, 1977, 17 organizations and approximately 130 individuals were under domestic intelligence investigation." The situation since that time has continued to go downhill.

How bad the situation had become by mid-1978 was frankly admitted by Mr. Sebastian S. Mignosa, Chief of the Domestic Security Section of the FBI, in an appearance before the House Permanent Select Committee on Intelligence on July 31, 1978. When Mr. Mignosa was asked whether his section handled subversive organizations coming under the Loyalty and Security Program called for by Executive Order 10450, his reply was, "We don't have any of those." When he was next asked who in the FBI dealt with such organizations, he replied, "There isn't any at the moment.... There isn't any of those type cases at the moment."

Actually the FBI still does maintain surveillance of a handful of organizations committed to terrorism and violence or involved in foreign espionage. But according to highly knowledgeable sources, its current domestic intelligence

operation represents a cutback of perhaps 90 to 95 percent from the levels of the 50's and 60's.

In 1965 the CSC referred the cases of 2,223 applicants to the FBI for full field investigations because preliminary evidence based on NAC's had turned up information bearing on the national security. By 1977 the number was down to 81. The author was told that the last full FBI field investigation of a NAC conversion was conducted in 1978.

The report on the attempted assassination of President Reagan issued by the Treasury Department in August 1981 states:

Interviews for this report with FBI and Secret Service personnel indicated that the total number of preliminary, intermediate, and full domestic security investigations involving both individuals and groups which were open at the time of our inquiry was far less than at any time covered by the GAO report. (Emphasis in original text)

The Treasury Department's report discussed the Attorney General's guidelines at considerable length because of the impact these guidelines have had on the capabilities of the Secret Service. It said that "the Secret Service's protective capabilities have been impaired by the decline in the quantity and quality of intelligence collected by the FBI, which is the primary source of the Service's domestic intelligence," and it suggested that the Attorney General's domestic security guidelines for the FBI be modified in a manner which permits the FBI "to pursue domestic security investigations where no criminal predicate is available."

The same arguments would be applicable to the reintegration of the FBI into the Federal Employee Security Program.

* * *

At the state and local levels, the 1970's also witnessed a massive destruction of intelligence files dealing with extremist organizations of both the far left and the far right. The State of Texas Public Safety Division destroyed its domestic intelligence files in 1974. The files of the New York State Police have been under lock since 1975; Washington, D.C., Baltimore, Pittsburgh, and other cities destroyed their files; the files of the Chicago Police Department

have been locked up since March 1973; while in New York City, Los Angeles, and other major cities there has been a wholesale destruction of files, in most cases exceeding 90 percent of the previous total.

Many law enforcement agencies at state and local levels have completely abandoned the domestic intelligence function and terminated their domestic intelligence units.

By itself, the abandonment of the domestic intelligence function and the massive destruction of domestic intelligence files would be catastrophic enough. But the situation has been further aggravated by the fact that, as a result of the fears generated by privacy legislation at the federal and state levels, law enforcement agencies -- which in the past always freely shared intelligence -- no longer share the little intelligence they still have on hand. Speaking about this situation, Captain Justin Dintino, Chief of Intelligence for the New Jersey State Police, told the Senate Subcommittee on Criminal Laws and Procedures in 1978:

The free flow of intelligence between Federal, State, and local agencies is essential to an effective law enforcement operation. To the extent that this flow is restricted, law enforcement is handicapped. And today this flow is terribly restricted, at every level and in every direction: From city-to-city, from State-to-State, from State agencies to Federal agencies, and from Federal agencies to the State and local level. This is a disastrous situation and we've got to find some way of reversing it.

The Devaluation of the NACI and the Background Investigation

It is not surprising that today's NACI's and Background Investigations produce far less substantive reports than those of ten or fifteen years ago. In the old days, the Civil Service Commission could count on the complete cooperation of federal, state and local agencies, and a very high degree of cooperation from private citizens and institutions and corporations. There were also, as we have pointed out, extensive domestic intelligence files maintained by state and local law enforcement agencies, as well as the files of the FBI and of the Security Research and Analysis Section. But the priceless reservoir of domestic security intelligence at state and local levels has for the most part been destroyed or locked up; the FBI has for all practical purposes been out of the

domestic intelligence business since 1976; and SRAS no longer exists. Private citizens, all the way up to the level of federal judges, frequently refuse to cooperate if they have adverse information because, under the Privacy Act and Jane Doe v. U.S. Civil Service Commission, the OPM can no longer guarantee confidentiality, if the information furnished in confidence is used as the basis for an adverse employment decision. The result has been a dramatic decline in the value of the NACI and the Background Investigation, especially as they relate to organizational affiliations that pose a danger to the national security.

In testimony before the Senate Subcommittee on Criminal Laws and Procedures in 1978, Stuart Knight, Director of the Secret Service, estimated that the Service was receiving at the most 50 percent of the amount of intelligence it used to receive to assist it in the protection of the president and the government, and that if one took into consideration the reduced quality and detail of the intelligence that was still available, the total loss of information was probably in the neighborhood of 75 percent. Substantially the same testimony was given by the Secret Service on July 31, 1981 before the Senate Subcommittee on the Constitution. It is common knowledge that the Secret Service, precisely because its mission is to protect the president, receives an exceptionally high degree of cooperation from local, state and federal agencies. If the intelligence available to the Secret Service today stands at approximately 25 percent of what it used to be, it would not be an unreasonable assumption that the information bearing on the national security brought together by the standard NACI procedure probably rates substantially less than 25 percent that of a decade ago or two decades ago.

The NACI still remains the minimal investigation for employees in non-sensitive and noncritical-sensitive positions. It cannot be abandoned because then we would have nothing. Clearly it must be retained, despite its very much reduced value in recent years. Instead of retaining the NACI, however, it is

now being proposed that for Level I employees, in a five-level system now being considered as a replacement for the present three-level system (Level I embraces the majority of the federal employees surveyed in an interagency task force study), the NACI be reduced to a NAC. This means that no form letters will be sent out to check on the identity of the applicant, on whether he has a local criminal record, etc.

The standard Background Investigation has not fared much better than the NACI. The basic reasons for the reduced quality of the BI have already been discussed. On top of this, the BI has suffered from successive reductions in scope. Before 1961, the BI's of applicants and appointees went back to 1937 or recognizing that a fixed 1937 starting point was illogical, the subject's 18th birthday. In 1960, the CSC reduced the period covered by the BI to 15 years, or the period since the 18th birthday. Within this new scope, a serious effort was made to conduct third-party interviews covering that span of time. In 1968 the CSC, after consulting the agencies, again reduced the scope of the standard BI -- this time to five years' intensive coverage. The intelligence and law enforcement agencies still generally adhere to the 15-year scope, but in OPM and the other agencies, the trend is still downwards.

While the OPM still retains the five-year scope, veteran investigators say that today's investigative reports are quantitatively and qualitatively inferior to those of ten or 15 years ago and this by a factor of some 30 to 40 percent. This is something that should be easily verifiable. As matters stand today, the average BI conducted by OPM involves some 31 contacts of all kinds, of which 16 are personal interviews. The average investigation of civilian employees conducted by DOD involves a total of 14 contacts, according to the same report. (There was no figure given for the number of personal interviews.) Measures under discussion today raise the serious possibility that the program may be further downgraded. Under the five-level system which is now under serious consideration by OPM, Level I employees would be subjected to a NAC only; Level II employees (in whose case the risk is defined as "opportunity for

significant but reversible damage to the national security") would be subjected only to a NACI; while Level III employees (in whose case the risk is defined as "opportunity for effecting serious but generally reversible damage to the national interest") would be subjected to a Limited Background Investigation (LBI), involving a NAC plus one year of personal coverage plus four years of written inquiries. The coverage specifications call for "in-person interviews with a minimum of three knowledgeable people." In the case of the standard BI, there are in-person interviews with anywhere from 12 to 30 or more witnesses. The standard BI is proposed for retention at the more sensitive Level IV. A 15-year Special Background Investigation is proposed for the most sensitive positions at Level V.

Thus, in effect, the quality of the Federal Employee Security Program has been squeezed from two sides. On the one hand, it has become progressively more difficult to obtain information; and on the other hand, there has simultaneously been a progressive reduction in the amount of time and energy invested in personnel investigations.

The FBI's reduced domestic intelligence activities, which have made it impossible for the Bureau to put its impressive capabilities at the disposal of the Federal Employee Security Program / yet ^{constitutes} another factor in the weakening of the BI. In the old days, if a preliminary investigation turned up evidence pointing to the possibility of subversive involvement, the case would automatically be referred to the FBI, and the FBI would then conduct a full field investigation of its own and report back to the Civil Service Commission or the other government agency involved. Over the past few years, however, when OPM has sent the FBI cases requiring further investigation because of evidence or allegations of subversive involvement, the FBI has returned the case to OPM with the suggestion that OPM itself conduct the investigation. Obviously, if the FBI has relevant information, it does forward it to the requesting agencies.

This is not a simple matter of the FBI withdrawing from its responsibilities.

In defense of the FBI, it must be noted that under the restrictions imposed by existing laws and existing guidelines it has become virtually impossible to conduct an effective domestic intelligence operation. To compound the damage, law enforcement agencies are at risk of having to pay a heavy price for intelligence operations they conducted in the past. The Socialist Workers' Party, for example, has been suing the FBI for \$40 million on the allegation that it was subjected to illegal surveillance. In another suit recently settled in Chicago, after seven years' litigation, the presiding judge noted that the FBI had furnished documents "at a rate substantially in excess of 1,000 pages per week...from mid-1977 through late 1980," and that these documents, totalling "several hundred thousand pages...reflect an extensive cross section of FBI domestic intelligence activities in the Chicago area during the period 1940 through 1980." Each of these several hundred thousand pages had to be gone through on a line-by-line, word-by-word basis before they were released -- a chore that must have accounted for tens of thousands of man-hours.

In summing up this section, it should be repeated that, despite the serious devaluation of the NACI and the BI, the background checks being conducted today have an important, if limited, utility, because they still do turn up criminal history information and other information having a general bearing on the question of suitability. But for the reasons already set forth they turn up very little information related to national security requirements.

The Closing Down of the SRAS

A more detailed history of the Security Research and Analysis Section of the CSC/OPM would be in order at this point because there is much evidence that the old Civil Service Commission was not simply restricting the Section's functions in response to mandatory rulings by the Supreme Court but was, instead, eager to seize at every legal and bureaucratic pretext for diminishing the function of the SRAS because there were those in the CSC who were philosophically

opposed -- some on bureaucratic, some on civil libertarian, some on quasi-legal grounds -- to the requirements of an effective personnel security program.

The SRAS had the specific assignment of helping the CSC, through a careful search of its records, to meet the requirements for National Agency Checks under Executive Order 10450. In 1953, at the time President Eisenhower promulgated EO 10450, the Research and Analysis Section was a very active operation whose total personnel was close to the 200 mark. By 1970, it was down to a staff of 42; by 1975, it was down to 20. By the end of 1979, the staff had been reduced to the point where it consisted of the section chief and two assistants, one a Grade 4 and the other a Grade 5.

The chief of the Section, W. ("Rush") Yarosh, was a man with impressive qualifications who had served with military intelligence in the U.S.A., Germany, Japan and other countries from 1945 to 1961; had retired with the rank of Lieutenant Colonel; had then served for a period of ten years as a Special Assistant for Security to the Director of the Intergovernmental Committee on European Migration in Geneva, Switzerland, screening refugees and Displaced Persons admitted to the United States (this position gave him access to, and liaison with, the intelligence communities of ICEM's 28 member nations); and had then moved in 1970 into the position of Chief of the Security Research and Analysis Section. It is indicative of the attitude of the bureaucracy to the SRAS that, although Yarosh made repeated efforts on their behalf, there was no promotion in grade for any of the SRAS employees during the last five years of the Section's existence.

The SRAS over a period of years was able to build up some formidable resources that greatly facilitated the task for preliminary investigations and saved the country many millions of dollars, at the same time as it enhanced the quality of our personnel security program.

First, there were several million personal and organizational reference

cards, based overwhelmingly on public record sources. Since each news item was indexed on a separate card, individuals with extensive and consistent records of extremist activities were sometimes the subjects of numerous cards pointing to the original source items that carried their names.

Second, there were file cabinets containing research materials culled from the national and local media, and from the publications of the various left-revolutionary and front organizations and of right-wing extremist groups.

Third, there was a massive library of newspapers and publications put out by the Communist Party USA and other Marxist-Leninist organizations committed to the revolutionary overthrow of the United States government. This library, for example, contained bound volumes of the Daily Worker (organ of the Communist Party), going back to the 1920's. The bound publications occupied some 50 feet of wall space, floor to ceiling, in the office of the Research and Analysis Section. These publications were supplemented by a large library of reference books and by complete sets of the many hundreds of volumes of hearings and reports published by the Senate Subcommittee on Internal Security and by the House Internal Security Committee (previously the House Committee on UnAmerican Activities) from the time of its inception to the time of its termination in 1975.

Finally, there was an extensive library of urban telephone directories and city directories, going back many years. This was an invaluable resource which enabled the SRAS and CSC to verify identity and do quick checks of the various addresses listed by the applicant, and to pinpoint neighbors in each community at the time he claimed to have lived there.

These were basic tools with which the Research and Analysis Section worked.
None of these now exist.

The argument used by the CSC General Counsel was that such record keeping was, in effect, prohibited by Section (E) (7) of the Privacy Act, which reads:

Agencies shall maintain no record describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or unless pertinent to or when in the scope of an authorized law enforcement activity.

Instead of sealing the personal reference cards, CSC could have reacted at the time by exploring three different possibilities. First, they could have argued that their uncollated personal reference card system did not constitute a system of records or files on individuals. Alternatively, they could have held that their responsibilities for the Federal Employee Security Program made them an authorized law enforcement activity of the U.S. government and that the reference cards were essential to the discharge of these responsibilities. As still another alternative, they could have sought authorizing legislation on an urgent basis. Instead, they capitulated without a struggle. Needless to say, this capitulation greatly impaired the ability of the SRAS to put their hands on vital information contained in their files.

Who was responsible for the sealing of the SRAS personal reference cards? The office of the CSC General Counsel unquestionably played an important role. Perhaps the central role, however, was played by Robert J. Drummond, Jr., Director of the Bureau of Personnel Investigations.

On June 3, 1975 Drummond wrote a lengthy memorandum to Robert E. Hampton, Chairman of the CSC, in which he recommended that the Commission discontinue the use of the personal reference cards immediately. The key paragraphs of this memorandum are worth reproducing because they are indicative of the defeatism and lack of understanding that have characterized a substantial number of the CSC's high command in years past:

In FY 1974, approximately 450,000 cases were searched through the files of the Security Research and Analysis Section (SRAS). This number represents all of the cases on which the Civil Service Commission conducts a National Agency Check plus about 32,000 cases on which searches are conducted, but a National Agency Check has not been scheduled, e.g., special searches for experts, consultants, instructors and other types of persons who are exempted from the investigatory requirements of Executive Order

10450. For the same period the SRAS produced information regarding possible identity on 6,255 cases (1.39 percent), and after research reported records out on 2,919 cases (0.65 percent).

[COMMENT: The fact that SRAS produced information bearing upon possible subversive associations in 2,919 cases out of 450,000 cases searched through its files, is clearly intended to belittle its performance -- especially when the number of cases is restated as 0.65 percent. In reality, this is a rather impressive accomplishment. The overwhelming majority of those who apply for government employment are loyal citizens. The entire purpose of a personnel security program in government is to try to weed out the one in 100 or one in 200 whose associations do raise serious questions about suitability for government employment on security grounds. If SRAS had reported records out on five percent, or even three percent of the cases referred to it, this would have been excessive enough to raise serious questions about the discretion exercised by the Section. If, in practice, SRAS found evidence pointing to a need for further FBI investigation in 0.65 percent of the cases, it suggests that it performed in a careful and responsible manner.]

It is true that a substantial portion of the information in the files is in the form of published hearings or has been published in newspapers, magazines, and other periodicals. The thrust of the question is that since the information is already in the public domain, where is the invasion of privacy. In my view, the infringement on individual rights and privacy comes about once we take this information that is in the public domain and index it by name. Then we are maintaining files on how individuals exercise their First Amendment rights.

In the public notice required by the Privacy Act we are identifying the Security Research and Analysis Index as records on "individuals who may be listed in an investigative leads file composed of information obtained from investigative reports, the public records, and various publications." I am sure this will pique the interest of sufficient numbers of citizens to cause us considerable workload responding to their requests as to records that we have on them. In many cases we will be unable to respond properly without further investigation to determine whether the requestor is the same "John Doe" mentioned in the Index.

[COMMENT: The personal reference cards in the Security Research and Analysis Index were not really files on individuals but simply investigative leads to the

source documents containing the articles referenced. A file, as such, did not come into existence until an individual applied for federal employment. At this point it became mandatory to open an investigative file on the applicant, and the published items referenced in the index became part of this file. In the case of the great majority of applicants there were no references. In the case of those whose public record activities raised questions related to the national security, a search of the files could, and quite often did, result in the compilation of a number of public record items which pointed to the need for further FBI investigation. Certainly there is validity to the argument that the SRAS procedure was not the equivalent of "maintaining files on how individuals exercise their First Amendment rights." And certainly the investigative process makes it mandatory that government agencies be placed in a position to assemble the bits and pieces of an applicant's personal record at the point where he applies for federal employment.]

As indicated in my memorandum of February 18, even if we were to conclude that the keeping of such a file is an essential part of our investigative responsibilities, and thus, pertinent to and within the scope of an authorized law enforcement activity, I think that continued maintenance and use of the file will eventually bring embarrassment to the Commission. (I am not sure we could successfully argue that the Commission is engaged in an "authorized law enforcement activity" by virtue of our responsibilities for administering the merit system through various statutes and executive orders.)

Privacy aside, it is one thing for the Commission to maintain records on individuals who are applicants or employees. However, in the case of the Security Research and Analysis Index, we maintain records on individuals who are neither applicants nor employees of the federal government and may never be applicants or employees.

[COMMENT: The answer to Drummond's argument that it would be difficult for the Commission to argue that it was an "authorized law enforcement activity" is the fact that the Commission does today refer to itself as such an activity. His objection to maintaining records "on individuals who are neither applicants nor employees of the federal government and may never be applicants or employees," is characteristic of the ultra-civil libertarian approach which

characterized many of the Commission's findings during this period. If there does not exist in some form records against which applicants for federal employment can be checked, then clearly it would be impossible to create such records at the point of application. In effect this is an argument for no federal security employee program at all in deference to the supreme right of privacy.]

The sealing of the personal reference cards, however, did not affect the SRAS organizational files, which were probably the most complete records of their kind maintained by any government office. In the course of personnel investigations it frequently happens that the name of some relatively unknown organization will crop up and the question that has to be confronted by reviewers and adjudicators is how much importance they should attach to association with such an organization. The files of SRAS contained vital information bearing on such questions -- and since the FBI had virtually taken itself out of the internal security field in 1976, SRAS was the only office in the U.S. government where such current information was available. By the end of 1978, however, even this important residual function had, for all practical purposes, come to an end because neither the Civil Service Commission nor the agencies for whom they handled personnel investigations appeared to be interested in domestic intelligence bearing on subversive and violence-prone organizations. The SRAS organizational files were still there -- but they were not being used.

In January of 1980, the chief of the SRAS was given five days to clean out his office and he was then assigned to another position. The 130 file cabinets containing research materials were arbitrarily consolidated to 50 file cabinets, and the entire office was reduced to two desks manned by the Grade 4 and Grade 5 assistants (who were, incidentally, much more qualified than their Grades suggest).

On December 11, 1979, Congressman John M. Ashbrook, the ranking minority member of the Subcommittee on Oversight of the House Permanent Select Committee on Intelligence, wrote to Mr. Alan K. Campbell, the director of OPM, urging that

the files on organizations and personnel be retained. Mr. Campbell replied on January 21, 1980 that the SRAS files were in fact being retained and he assured Ashbrook that "appropriate Congressional committees will be consulted prior to a decision regarding the disposition of these files." On July 9, 1980, without notifying Congressman Ashbrook, the OPM wrote to Ms. Karen Boyd, President of Local 32 of the American Federation of Government Employees, informing her that the Division of Personnel Investigation "is preparing to inactivate the Security Research and Analysis Section...on or about July 21, 1980," that all SRAS records would be sent to storage as soon as possible, and that the two remaining employees in the Section would be reassigned to other duties. And so the Section was abolished, and the research files, the extensive reference library, the organizational index, and the telephone directories and city directories were boxed and sent elsewhere.

The CSC/OPM, through this series of actions, has deprived itself of virtually every in-house investigative tool that previously used to serve the old Civil Service Commission.

It may be that the negative attitude towards the Research and Analysis Section on the part of the Civil Service Commission directorate previously, and the Office of Personnel Management more recently, was based on ignorance. Some of the former officials of the Section are convinced that many of their superiors never really understood the program because they had never worked in it, or shown enough interest in it to carefully examine its operation. Drummond, for example, although he was supposed to be in direct charge of the SRAS, never once in the many years he was with CSC took the time to visit it for the purpose of familiarizing himself with the operation.

Drummond's attitude was characteristic of a wider attitude common to the top brass in CSC, especially under the regime of its last director, Alan K. Campbell. Both Drummond and Campbell were unquestionably competent, and their

geniality made it hard to dislike them. But, according to a fairly wide array of investigators and senior officials who worked under them, they never really felt at home with the investigative program -- their primary interest was in promoting equal employment opportunities in the agency for minorities and women. One official told the author that he had overheard Mr. Campbell say in 1976, shortly after he joined the agency, that he didn't think much of investigations or investigators. "Are these investigations really necessary?", he asked; "Aren't they a carryover from the McCarthy period?".

All of which adds up to the conclusion that, in appointing people to key positions in the personnel security machinery, geniality and managerial competence and the milk-of-human-kindness humanity do not constitute adequate qualification. These are positions which call for men who have a visceral feeling for the importance of internal and personnel security, and who are prepared to combine fairness with a tough-minded attitude toward the investigative process.

Certainly, the decision not to maintain research files of any kind, even files based on public record material, flies in the face of common sense. When appropriate agencies of the United States government deny themselves the right to compile, from media sources, information essential to identify personalities or organizations whose commitments and activities pose a potential threat to the national security or to the national interest, they are, in effect, denying the government the basic right to take reasonable action to preserve itself.

In its early days, the program attracted many knowledgeable and dedicated people who, through years of personal exposure to the problem, were able to bring expertise to the administration of the Federal Employee Security Program. But the progressive degradation of the program over the past decade has resulted in the early retirement of the great majority of the experienced personnel security hands. Their places have been taken, for the most part, by young,

inexperienced people who are now trying to perform a job they do not understand -- with no internal security background, little or no training, no in-house data base to assist them, no guidelines, and no encouragement. It is not their fault that the Federal Employee Security Program, in most departments and agencies, has now become a costly and almost meaningless charade that is doing grave damage to our national security. They, too, are the victims of the system.

The Freeze on the Exchange of Domestic Intelligence

These self-inflicted injuries to the Federal Employee Security Program have been compounded by the progressive chill on the exchange of data between state and local agencies and the federal government. Commenting on this point, a GAO report dated December 16, 1977 said:

Due to legal constraints and nonresponses to inquiries, CSC cannot check some local enforcement records, even though the check is required by Executive Order 10450. By September 1976, the Chicago area [of CSC] had stopped sending [requests for information] to law enforcement agencies in New York, California, Minnesota, New Mexico, Massachusetts, and Illinois, and 86 cities in other States, because the agencies refused to release criminal information to CSC. Some of the larger cities are Detroit, Indianapolis, and Washington, D.C. Thus, an investigation cannot surface criminal information on individuals who reside in these areas, unless the information is also on file with the FBI.

When Mr. Alan K. Campbell, Chairman of the U.S. Civil Service Commission, appeared before the Senate Subcommittee on Criminal Laws and Procedures in March 1978, he confirmed that this was an accurate description of the situation that existed in 1976 and he said that there had been no improvement since that time.

In August 1980, in an effort to induce a more cooperative attitude on the part of state and local law enforcement authorities, OPM mailed out a pocket-sized brochure captioned "The U.S. Office of Personnel Management: An Authorized User of State and Local Criminal History Information." The booklet described the OPM program; made the argument that its need for criminal history information

is critical to the national security and interest; and pointed out that its requirement for such information is based on statute and is consistent with the regulatory requirements of the Law Enforcement Assistance Administration. OPM believes that it is now getting improved cooperation from many law enforcement agencies as a result of its continuing exercise in education and public relations. But the situation nation-wide is still very bad, with some of the major industrial states, including New York, Pennsylvania, New Jersey and Massachusetts, not cooperating at all or cooperating in a very niggardly manner. As recently as January 1981, an internal information bulletin of the Personnel Investigations Division indicated that OPM continues to operate under the same handicaps which so crippled the operation of the Civil Service Commission. The bulletin said:

Since the enactment of the 1974 Privacy Act, many state and local authorities have become increasingly sensitive to the issue of individual privacy. A number of these authorities have interpreted their responsibilities in the area of individual privacy to include increased restrictions on the dissemination of criminal history data in state and local files to noncriminal justice agencies in the federal government, even though the legal and regulatory authorities of these agencies, including the investigative authorities of the OPM, meet all of the requirements for access. Privacy consideration and a number of other factors, such as the workload involved in processing federal agency requests for information, have been used by a number of state and local authorities as a basis for denying federal agencies access to all or part of the information in their files.

Cutting the Costs of Personnel Security: A Study in False Economy

There are factors other than FOIA and the Privacy Act and constraints on investigators that have contributed to the decline of the Federal Employee Security Program. One of these has been the low priority which most government agencies -- including the Department of Defense but not including the intelligence and law enforcement communities -- have assigned to their personnel security programs since the early 1960's. Personnel security divisions have been starved for funds and starved for staff and their programs have been de-emphasized and cheapened to the point where many conscientious senior employees have taken their

retirements early out of a feeling of complete frustration. Although the implementation of an effective security program requires personnel of high competence and superior judgment, those assigned to jobs in the field of personnel security have all too frequently been employees of inferior competence and limited background. This tendency has been exacerbated by the fact that few officials with personal ambition gravitate voluntarily to the area of personnel security because it is a field where the prospects for advancement are limited and where it is virtually impossible to make a name for oneself. Every ambitious office-holder wants to do a good job. But the field of government personnel security is today encumbered by so many restrictions that even the most conscientious bureaucrat would find it impossible to turn in a truly effective performance.

In harmony with all this, it has been a frequent practice on the part of government agencies, when economies were called for, to effect these economies primarily at the expense of the personnel security machinery. (The tendency to do so has no doubt been further encouraged by the fact that the various offices directly concerned with the personnel security program produce -- for better or worse -- an invisible and unquantifiable product.) The examples are numerous.

In 1965, the Civil Service Commission eliminated the requirement for full field investigations in the case of noncritical-sensitive positions -- which are in most departments far more numerous than critical-sensitive positions. In 1972, it stopped budgeting for an investigators training program.* It progressively reduced and then dismantled the Security Research and Analysis Section.

* In the latter part of 1979, Peter Garcia, the present director of DPI, reinstituted a one-week training program for investigators and four such one-week programs have now taken place. But from 1972 to 1979 there was no training.

It cut back on the scope and reduced the thoroughness of Background Investigations.

Finally, there is the matter of the limitations placed on the Investigations Evaluation Branch (IEB) which is supposed to function as a quality control unit in the field of investigation. Theoretically, IEB is required to review each agency every two years by doing spot checks on their personnel security procedures. According to a September 1980 report,* because of IEB's limited resources, some agencies and offices, including OPM itself, have not been reviewed in five or more years, and some have never been reviewed. [OPM now states that this situation has improved and that the IEB since January 1980 has had the resources to cope with its assignment.]

It should be emphasized once again that the systematic budgetary starvation of the Federal Employee Security Program is not limited to the OPM. It is government-wide, and the responsibility is shared by Congress as well as the federal bureaucracy. It was Congress, for example, which in 1976 mandated a 27-percent cut in the personnel of the Defense Investigative Service (DIS) -- a reduction in force that has played a major role in the almost paralyzing backlog of Background Investigations against which the Department of Defense is now struggling.

One of the most dramatic examples of excesses perpetrated against the personnel security program in the name of economy is to be found in the Department of Health and Human Services, which has a total staff of some 170,000 employees. A number of years back, the Department's Office of Internal Security, whose primary function was personnel investigation, had a staff of 38. As recently as two or three years ago, there were ten professional and support staff in the Division of

* Personnel Investigations: Ways to Improve Services and Reduce Costs, Office of Internal Evaluation, OPM. September 1980.

Personnel Investigations. Today it is down to a staff of three -- the director, one specialist and one clerk. As a result of the inversion of values imposed by the Carter Administration, there still are, by way of contrast, 333 investigators and staff assistants assigned to the civil rights division of HHS. It is not that civil rights are unimportant -- but surely, in any rational plan of things, personnel security would have to be assigned at least equal importance.

The Government Accounting Office must also be given a portion of the blame for the government-wide tendency to cut back on the costs of personnel security programs. Indicative of the recurring theme of its several studies of the situation is its August 1979 report, "Costs of Federal Personnel Security Investigations Could and Should Be Cut." It has yet to produce a report entitled "The Quality of the Federal Employee Security Program Must Be Improved."

It would, perhaps, be too much to expect GAO, whose strong point is managerial expertise, to manifest a sophisticated understanding of the need for an effective employee security program and the myriad problems involved in such a program. Internal security has over the past two decades become an increasingly arcane profession. The great majority of those who might qualify as experts are now out of government, and of those who remain, it is highly questionable that GAO possesses any meaningful representation.

The pressure brought to bear on OPM by the GAO proposal is reflected in the five-level system being proposed by an interagency task force for designating the sensitivity of positions and activities. Of a total of 1,652,083 positions tentatively surveyed in connection with the recommended system, 1,098,166 fall in Level I under the new arrangement. In order to save \$11 per position, the new plan proposes to reduce personnel investigations in Level I from a NACI to a NAC (\$36.29 against \$25.05). The NACI, as we have pointed out, has traditionally been considered a minimal investigation. Reducing it to a NAC means that letters will not even be written to local police departments (unless there is information

indicating that such checks are necessary) asking whether the applicant has a criminal record -- indeed, without the inquiries to reinforce the National Agency Check, the employing agency would not even be able to confirm that the applicant is who he says he is. Veteran investigators with whom the proposal was discussed feel that for the sake of achieving a minimal saving, the quality of the investigation that is going to be accorded the great majority of government employees will suffer seriously.

The punitive budgetary treatment of the offices concerned with personnel security might lead one to think that it was a matter of saving billions or at least hundreds of millions of dollars. Actually, the total annual cost of the government's personnel security program, compared with its purpose and importance, is ridiculously low. A report put out by the Comptroller General in August 1979 gave these figures for the cost of the program, government-wide, but not including the Department of Defense, for fiscal year 1978:

	<u>Number</u>	<u>Costs</u> (millions)
Full-field investigations	152,057	\$61.6
Other investigations, such as updates, NACI, and NAC	<u>1,140,812</u>	<u>10.1</u>
Total	<u>1,292,869</u>	<u>\$71.7</u>

If we add to this the rough figure of \$90 million for the Department of Defense and make some allowance for agency investigations not covered by the GAO survey, the total cost for 1978 would be substantially under \$200 million.

There are many areas in the bloated federal bureaucracy where cuts -- even heavy cuts -- can be imposed to advantage. But that is not the case with the Personnel Security Program. Like our national defense establishment, this program has to be rescued from the incremental economies imposed on it year after year. If the entire operation were beefed up to the point where it cost double what it costs today, it seems to the author of this paper that this

would still be little enough to pay for enhancing the quality of the Federal Employee Security Program.

The Jane Doe Decision

A decision of far-reaching significance for the future of the Federal Employee Security Program was handed down on January 16, 1980 by the Federal Court for the Southern District of New York (Jane Doe v. U.S. Civil Service Commission). Jane Doe was a candidate for a White House fellowship. In the course of an investigation by the Civil Service Commission, two of the 35 witnesses interviewed stated that she appeared to be afflicted with kleptomania, that she had stolen some very small items from them. Their statements were given on condition of confidentiality. When Jane Doe was not selected for the White House fellowship, she petitioned under the Privacy Act for a copy of her investigative file. She was given a copy of her file, with the identities of the two adverse witnesses deleted. She then sought to persuade the Civil Service Commission to eliminate from her file the information provided by the adverse witnesses, or alternatively, to compel the adverse witnesses to come forward and confront her. The Civil Service Commission turned down this request. She then brought suit against the Civil Service Commission charging that the Commission had unconstitutionally violated her liberty interests by disclosing derogatory allegations against her without affording her an opportunity to refute the charges.

In its decision, the Court upheld her complaint. It ruled that "if the agency wants to include the derogatory report in Doe's file, she must have a chance to question the sources and challenge their credibility." The Court also found that the CSC's investigatory and disclosure procedures violated Doe's right to due process and it ordered the agency to provide Doe with an opportunity to refute the allegations, with appropriate discovery if necessary. Finally, the Court found that Doe had "a constitutionally based cause of action against

the named defendants in their individual capacity." Presumably this ruling could also be extended to investigative witnesses.

In the aftermath of Jane Doe v. U.S. Civil Service Commission, the Office of Personnel Management on November 28, 1980 proposed sweeping changes in the conduct of personnel investigations. The proposal, while conceding that OPM investigative reports have traditionally contained information from confidential sources, suggested that in future investigations, if a source refuses to withdraw his request for confidentiality, the information from that source would not be reported.

The proposal also stated that:

When an agency, as a result of information in an OPM report of investigation, changes a tentative decision (selection, promotion, grant clearance, etc.) to an unfavorable decision, it must provide the subject the specific reason(s) for the decision based on the information in the report, and allow the person a specified period of time, fifteen (15) calendar days, to respond. An extension of time to respond may be granted for sufficient cause. The subject must be given an opportunity to respond orally, in writing, or both, and to have the right of representation.

Going beyond the changes that may have been indicated by the Court's decision in Jane Doe v. U.S. Civil Service Commission, OPM proposed changing the retention schedule of investigative files from 20 years to seven years. This is a completely arbitrary time frame. If an investigation terminates in nonselection, and if the subject of the investigation eight or nine years down the line reapplies for employment in the federal government, the record of his previous investigation would not be available under OPM's proposed retention schedule. In the case of those who are selected for government employment, it would seem far more logical to retain investigative files for the duration of their employable years. In the case of those who are rejected, files should be retained at least until they reach age 65, and retained indefinitely in cases where they have a continuing application.

The OPM reports that no action has yet been taken on the November 28, 1980 proposal although the proposal itself and agency comments on it are under

active consideration.

Coming back to the essence of the Doe decision, it will, if permitted to stand unchallenged, have a very serious effect on future investigations under the Federal Employee Security Program. It has been recognized in the past that there are many valid reasons why witnesses who possess adverse information about applicants for federal employment may condition their cooperation on a pledge of confidentiality. When, under the old system, several confidential witnesses provided corroborative accounts of an adverse nature, this evidence would be weighed very seriously. Today, all that is over.

Even more distressing are the implications of the Court's decision upholding the right of Jane Doe to claim damages from investigators and Civil Service Commission officials who had contact with her case. For reasons of simple human nature, investigators will be far less likely to report adverse information that comes to their attention and personnel directors will be far less likely to make adverse determinations if this can result in a suit for tens of thousands of dollars. Indeed, quite a few investigators and officials working in the field of personnel security have taken out insurance against this possibility. Clearly the safest course for them to follow would be to avoid all adverse information and all adverse determinations, except in the most glaring cases. It is common knowledge in the personnel security community that this is precisely what many investigators and reviewers do -- although there are a surprising number who still report the facts and exercise their objective judgment despite the uncertainties attendant on doing so.

There is much to be said for the Court's contention that Jane Doe should have been advised of the allegations against her and should have had an opportunity to respond to the allegations before the information was passed on to the panel in charge of selections for the White House fellowship program. The question is whether this basic due process requirement could not be achieved without insisting

on the identification of confidential witnesses and without making investigators information recorded or and officials civilly liable for/decisions reached in good faith.

The Department of Justice wanted to appeal the Jane Doe decision precisely because they felt that the Court had gone far beyond the actual requirements of due process in the restrictions it imposed on future investigative procedures. Unfortunately, the CSC/OPM, instead of appealing, made a settlement with Jane Doe for \$25,000 in actual damages, and agreed to restore her name to the list of those eligible for White House fellowships. Having settled the case, the OPM automatically made a future appeal against the Court's decision impossible. The Jane Doe decision, in consequence, has now become the law of the land. In this instance, as in so many instances before it, the CSC surrendered valuable ground without putting up a fight to the finish in the courts. In doing so, it has compromised the operations of the personnel security programs in all sectors of the government.

In the first part of 1980 the OPM's Division of Personnel Investigations (DPI) made an effort to change the rules in a positive direction. Under its newly defined rule, if a witness refused to recommend an applicant, the investigator was instructed to report his reason or reasons, no matter what they were, approximately in the witness's words. The rationale for this was that the inclusion of the information did not have to be defended, since it was simply a matter of reporting accurately the witness's reason for refusing to recommend. The Jane Doe decision, however, introduces an element of ambiguity into this more rational approach.

SECURITY CLEARANCE PROCEDURES IN THE INTELLIGENCE AGENCIES AND FBI

There are two areas where government agencies still adhere to fairly stringent personnel security requirements -- the intelligence community and the law enforcement community.

In September 1979 the Subcommittee on Oversight of the House Permanent Select Committee on Intelligence, after holding hearings with the various agencies involved, brought out a staff report on Security Clearance Procedures in the Intelligence Agencies. The report reviewed procedures in both the intelligence-producing agencies (the CIA, the Defense Intelligence Agency and the National Security Agency) and the major intelligence-using agencies (the State Department and the Department of Defense). It found tremendous differences in standards and procedures. "Each agency," it reported, "conducts its own investigation, and all such investigations differ one from the other in depth, scope and technique." The investigation of the Subcommittee focused heavily on the procedures used to screen applicants for access to Sensitive Compartmented Information (SCI), a category of intelligence data that calls for special controls in handling restricted information within a compartmented intelligence system.

Despite the very limited value of the current National Agency Checks and the restrictive effects of privacy legislation, the CIA and the NSA have made heroic efforts to keep their background checks effective. While most government agencies check back only on the last five years of an applicant's life (or the years from the 18th birthday, whichever period is shorter), the CIA's Background Investigation of applicants goes back 15 years (or the years from the 18th birthday). It interviews a minimum of five character references with a view to establishing the habits, loyalty and morals of the individual. In addition to political associations it considers such factors as emotional stability, personal idiosyncracies, financial responsibility, employment record, marital difficulties, alcohol abuse and other drug use, homosexuality and gross character deficiencies. The applicant must submit to both a physical exam and a psychiatric screening. The CIA also relies heavily on polygraphic examination of applicants. According to the report, the CIA turns down approximately ten percent of all applicants for reasons of trustworthiness or security -- a very

high percentage when compared with other government agencies. Of the ten percent rejected, fully 75 percent were turned down because of their polygraph performance or because of the combination of this performance with Background Investigations. Only 24.5 percent were turned down because of information developed by the Background Investigation itself.

Even more rigorous is the procedure followed by the National Security Agency. The polygraph examination is the first step in the NSA's clearance process and NSA explicitly uses the polygraph as a primary tool for the development of adverse information. NSA reported to the Subcommittee that at least 95 percent of all negative information on applicants came from the polygraph. Of 2,531 applicants who were processed during fiscal year 1978, 775, or 32 percent, were rejected. Still more striking were NSA's statistics on clearances granted for access to Sensitive Compartmented Information (SCI). Of 1,799 applicants whose processing was completed during fiscal year 1978, only 1,024 were granted SCI clearance while 775 were denied clearance. These results appear draconian when compared to those of the Defense Intelligence Agency which granted SCI clearances to 5,937 employees in the same fiscal year while denying clearance to only 48, or to those of the Army which granted SCI clearance to 9,790 while denying it in 710 cases.

There exists no study of personnel investigative procedures of the FBI comparable to the report on the intelligence community procedures which we have just quoted. But it is noteworthy that the FBI, in its comment on the report proposing the establishment of the new five-level personnel security program, made the observation that it would continue to give all applicants for employment with the Bureau a 15-year Background Investigation.

THE DEPARTMENT OF DEFENSE

It has been estimated that the Defense Department is responsible for some

75 percent of all Background Investigations conducted within the Executive Branch. This is only natural, given the size of the defense establishment and the highly classified nature of much of its activity. The quality of the personnel security program in the Department of Defense is, therefore, a matter of vital concern.

Civilian employees of DOD fall under the provisions of Executive Order 10450. Military personnel are not governed by EO 10450, but instead are screened under a parallel program which is basically similar to that which governs the civilian employees, but whose authority derives from the President's inherent power as commander-in-chief of the armed forces, rather than from an Executive order or Act of Congress. The present military personnel security program is based on DOD Directive 5200.2-R, 1979. The purpose of this directive was stated in the following terms:

To establish policies and procedures to ensure that acceptance and retention of personnel in the Armed Forces, acceptance and retention of civilian employees in the Department of Defense (DoD), and granting members of the Armed Forces, DoD civilian employees, and other affiliated persons access to classified information are clearly consistent with the interests of national security.

Like all other government departments, DOD's personnel security program has suffered grave damage as a result of the destruction of the domestic intelligence data base, the virtually complete suspension of domestic intelligence activities by law enforcement agencies, and the impact of privacy legislation on the investigative process. Defense Department investigators receive a much higher degree of cooperation from government agencies and private institutions and citizens than does the OPM. But the degree of cooperation makes very little difference when there is no domestic intelligence available. The director of the Defense Investigative Service (DIS) told the author that, while his Service does receive a good deal of criminal history information from local law enforcement agencies, he could not recall a single item of information

from local sources in recent years that had to do with the matter of subversive associations.

The FBI does possess extensive domestic intelligence files going back beyond 1976, but it has added precious little new intelligence since that year. Since virtually all military enlistees are in the 18 to 21 age group, the FBI's pre-1976 domestic intelligence files have very little relevance as a data base for screening out youthful left-wing and right-wing extremists who might pose a danger to the integrity of the armed forces -- as potential saboteurs, as inciters of racial incidents, as espionage agents, or as revolutionary agitators who might at some future date surface on command. About the best DOD can hope to do is to keep a careful eye open for troublemakers after they pass the point of induction.

Although ^{the} DOD does much better when it comes to simple criminal history information, even in this area it has been having a lot of difficulty. A study by SEARCH GROUP, Inc.* reported that the recruiting services were having major problems in obtaining criminal justice or related data. It said that "the recruiting commands are often denied access to criminal history data even in states that provide access to other DOD components and to other federal agencies." It quoted the following paragraph from the December 1978 issue of DOD's Command Magazine:

A Marine Corps study found that the flaw in current recruiting is not so much malpractice as it is the recruiter's inability to check out the applicant's statements. Many school and police jurisdictions simply take a strict approach and provide no personal information. It leaves recruiters with no means of checking out statements.

The SEARCH study points out that the DOD's ability to obtain access to criminal history information varies significantly from one state to another.

*SEARCH GROUP, Inc., "Federal Access to State and Local Criminal Justice Information for Federal Personnel Security and Employment Suitability Determination," Sacramento, California, March 1979.

Because of sealing and purging standards and other limitations, only 17 states release both conviction and non-conviction data to DOD requestors; 15 states release only conviction data; four states provide little or no access to records; and the remainder are a mixed bag. While noting that most states do cooperate in one degree or another with DOD, the study reports that "only a small group of states disclose all criminal history under all circumstances to all DOD components."

The blame for this situation stems to a large degree, says the study, from a restrictive interpretation of LEAA regulations. Under these regulations, state and local agencies receiving LEAA assistance are barred from disclosing non-conviction data to a non-criminal justice agency unless the disclosure is for a purpose authorized by "statute, ordinance, executive order or court rule." The restrictions persist despite a finding by LEAA's General Counsel that under various statutes and Executive orders the DIS does qualify to receive non-conviction information.

Senior DOD officials concerned with the program told the author that, while they do much better than other government agencies, their difficulties in accessing information, instead of diminishing, have continued to grow in recent years.

Thanks to all these limitations, there are some worrisome shortcomings in DOD's personnel security procedures at several levels.

Enlistees, as has been pointed out, are required to undergo an ENTNAC, which is a NAC without a fingerprint check. This is supplemented at the point of recruitment by form inquiries sent out by the various recruiting commands to high schools and to state and local criminal justice agencies. DOD officials feel that this makes the ENTNAC the virtual equivalent of a NACI, minus the fingerprint checks. DIS says that it dispenses with the fingerprint search in the case of enlistees because an ENTNAC search comes back in 28 days while a full NAC takes an average of 59 days. This delay, they say, could have a

serious adverse effect on the recruiting process. The question remains whether it would not be sounder procedure to induct enlistees on the basis of an ENTNAC, and then proceed with the fingerprint check. To this DOD replies that their studies have shown that very little potentially disqualifying information has been lost through omitting the fingerprint check from the ENTNAC program. On this point, DOD's evaluation appears to be in conflict with that of other agencies, including the intelligence and law enforcement agencies. Perhaps this is an area where a study conducted by an independent panel of experts might be helpful.

If the ENTNAC turns up no disqualifying information, the enlistee is taken aboard and qualified for access to information and technology up to the level of Secret. This is reason for serious concern when one considers, to take one possibility of many, that a youthful radical, committed to the defeat of the United States in the event of war (a cardinal tenet of all Marxist-Leninist groups), might easily qualify as a crew member aboard a nuclear missile submarine or, after taking a course of instruction, as a computer programmer. (While all officers aboard nuclear submarines undergo a background check -- now an IBI -- the majority of enlisted men do not.) Unfortunately, DOD, with the best of intentions, can do nothing about this situation in the absence of a domestic intelligence program and data base, and in the absence of any official guidelines.

Civilian employees are accepted by DOD on the basis of a NACI, with access, again, up to the level of Secret. To the author this appears to be a quite inadequate level of investigation in a department where much of the information to which such a clearance gives access is so extremely sensitive.

Members of the armed forces can now be cleared for access to Top Secret
 information on the basis of an "Interview-Oriented Background Investigation" (IBI), consisting of a one or two-hour interview, a NAC, a credit check, and, in some cases, "select scoping," in which investigators seek to zero in on problem

areas suggested by the interview or the NAC. The IBI will be discussed in more detail in the pages that follow. Civilians, however, whose clearances are governed by OPM rules, must undergo a full field Background Investigation to qualify for Top Secret. This is supplemented, as is always the case, with a NAC. Retired FBI officials and personnel security officers with whom the author discussed the matter uniformly expressed the opinion that an IBI was a seriously inadequate investigative procedure to justify access to Top Secret files.

Access to the most sensitive kind of information, Sensitive Compartmented Information, requires a full 15-year BI. More than this would be unreasonable.

There is reason for concern, too, about the state of DOD's industrial security program for industrial contractor personnel. For Confidential clearances, DOD relies on checks made by the contracting companies. For Secret clearances, it requires a NAC -- a procedure, to repeat again, that has been gravely devalued from a national security standpoint. For Top Secret clearances the rules require an IBI. The investigations are conducted by the Defense Investigative Service (DIS), but the actual clearance decision is made by the Defense Industrial Security Clearance Office (DISCO). If DISCO refuses clearance, the case is sent to the Pentagon for review. If the decision is still negative, there are provisions for the employee to appeal with an assurance of due process.

A GAO report of September 15, 1981 ("Faster Processing of DOD Personnel Security Clearances Could Avoid Millions in Losses") stated that, to avoid extensive delays in some programs, DOD has had to issue an increasing number of interim clearances to industrial personnel. Like the waivers of pre-employment security investigations that have been granted so extensively by other government departments, the interim clearance is followed at some later date by a National Agency Check and a Background Investigation. The GAO report said that 9,600 interim clearances were issued to industrial personnel in 1980 compared to 6,100 in 1978. It noted that an unknown number of the interim clearances issued had to

be revoked subsequently because of disqualifying derogatory information developed by the investigation. "GAO believes," said the report, "that the increase in the use of interim clearances increases the risk to the national security."

In response to this criticism, DOD says that interim clearance procedures are based on many factors, including the clearance level required, the sensitivity of the assignment, etc. They point out, for example, that in the case of a request for Top Secret clearance, an interim clearance may be granted only after a NAC has been favorably completed and the IBI has been initiated. This interim procedure, says DOD, when properly implemented, provides a judicious balance between security considerations and the manpower needs of DOD.

As things stand today, those in charge of personnel security at DOD may be correct in this appraisal. The question remains whether it would not be far better to provide the DIS with the necessary manpower to keep up with their investigative workload so that no significant detriment to the defense production program would result from the delay in processing clearances in the proper sequence. It would also be helpful if DOD could fill in the quantity for the "unknown number of interim clearances" which the GAO said had to be revoked subsequently because of disqualifying derogatory information.

This situation has come about primarily because the Defense Department's personnel security program has suffered drastically from budgetary constraints. In 1976, Congress, in an ill-considered action, mandated a 27-percent cut in the personnel of DIS. By June of 1981, DIS had a backlog of some 83,000 investigations waiting to be completed. This figure included prospective employees, defense contractor employees, and officers and enlisted men awaiting assignment in sensitive positions. According to a June 1981 memorandum to the secretaries of military departments, the Chairman of the Joint Chiefs of Staff and directors of Defense agencies, DIS was at that time opening a thousand cases a week more than it closed and this had produced a situation in which large numbers of

personnel could not be productively utilized because they did not have security clearances. This had resulted in a serious degradation of operational readiness. It was also delaying, in some cases by more than a year, the finalization of contracts for classified hardware because new contractors and their employees must undergo security checks before they enter into production.

For once, the General Accounting Office, which has generally called for more economy in the government's personnel security program, came to the rescue. On September 15, 1981, the Comptroller General sent to the Congress a report previously quoted captioned, "Faster Processing of DOD Personnel Security Clearances Could Avoid Millions in Losses." The GAO stated:

...Security clearance requests for DOD and industry personnel have increased substantially since 1978 without a corresponding increase in DOD and FBI personnel who investigate and process the requests. Processing delays -- some averaging 220 days -- are costly and could weaken national security. Based on an industry study, GAO estimates that 1982 productivity losses could cost the government as much as \$920 million -- \$340 million for industry and \$580 million for DOD.

The report noted with approval that the Deputy Undersecretary of Defense for Policy had asked the Secretary of Defense for an additional \$12.5 million for DIS to cover 880 new positions, including 595 investigators. Since the report was issued, DIS has been promised an additional 200 positions. This will contribute somewhat to reducing the backlog, but almost certainly not enough.

The report also noted that the FBI Identification Division, which checks fingerprints in connection with all government employee security programs, was badly understaffed, with the result that its turnaround time had increased from 14 workdays in 1978 to 58 calendar days in June of 1981. This obviously contributed to the processing backlog at DOD. It recommended that the Identification Division be substantially augmented, suggesting the addition of 570 new positions at a cost of about \$7.8 million.

The amounts suggested in connection with both of GAO's recommendations are

miniscule against the standards of contemporary government spending. They are expenditures that are vital to the domestic and national security. The question remains whether Congress and the Administration will show a sufficient understanding of the problem of personnel security to make the very modest budgetary changes recommended by the GAO.

Meanwhile, to help cope with its horrendous investigative backlog, the June DOD memorandum, signed by Undersecretary Frank Carlucci, called for a moratorium on all periodic reinvestigations, a blanket prohibition on BI's for those whose access was at the Secret or lower level, and the reassignment of investigators from other military departments to the DIS. In the case of military personnel under consideration for Top Secret clearance, it called for substituting the IBI, consisting of an intensive interview with the subject, for the full field BI, which involves personal interviews with a substantial number of third parties.

By mid-November 1981, the backlog had been brought down to 75,000.

Senior DOD officials concerned with the personnel security program take the stand that the shift to the IBI was made in the interests of improved quality rather than the interests of economy. They refer to a study conducted by DOD* in which 471 cases -- appropriately divided between military personnel, DOD civilians and industrial contract employees -- were evaluated according to both the old method and the new method. According to the report, the two types of investigation turned up a total of 186 items of significant adverse information. Of the 186, both the old and the new forms of investigation produced adverse information in 92 cases, or 49 percent; the old type investigation turned up adverse information in another 22 cases, or 12 percent; and the IBI turned up adverse information in another 72 cases, or 39 percent.

*Department of Defense, Test Results, New Background Investigation, Washington, D.C., March 1981.

DOD officials further point out that the evaluation of the IBI pilot project was accomplished by senior adjudicators of the various DOD components, who carefully reviewed the entire investigative process.

Long-time personnel security professionals express serious reservations about these findings. One reason for their skepticism is that the DOD report gives no indication of the degree of thoroughness of the BI. They say it is important to know how many witnesses were interviewed, whether the interviews were conducted in person or over the telephone, how many records were searched, and the facts about other variables. They point out that the figures themselves do not indicate the type of adverse information volunteered by the witnesses or its gravity. As an example, they argue that if an interviewee was a member of the Communist Party or some other extremist organization, he would almost certainly not volunteer this information in response to a question -- although he might, to achieve credibility, admit to some non-disqualifying peccadillos in his past record. They also take issue with DOD's assertion that the old-fashioned full field investigation has become ineffective because there is no real "take" from neighborhood investigations or interviews with persons given as references, professors, etc. They point to the fact that our law enforcement and intelligence agencies all insist on full field Background Investigations.

DOD officials counter with the argument that they have had more experience with investigations than any other agency and the other agencies are simply behind the times.

The issue is important enough to warrant reexamination by a carefully selected panel of personnel security experts. If DOD is right, then the system should be extended to other government departments. If DOD is wrong about the IBI, no time should be lost in augmenting the procedure with some third-party interviews to avoid potential damage to the integrity of its personnel security program.

DOD personnel security officials readily agree that the most effective system would be to combine the in-depth subject interview with the old-fashioned BI based on third-party interviews and document searches -- as the intelligence and law enforcement agencies and the State Department do. Their argument is that they have to accept budgetary constraints as a fact of life, that this compels them to make a choice between the two approaches, and, confronted with this choice, they have opted for the IBI over the BI.

This argument really goes to the heart of the problem confronting those concerned with the problem of personnel security in our defense establishment. By and large they are competent and dedicated professionals who have a genuine understanding of the importance of sound security practices. But they do not make budgets or determine policy; these things are done at higher levels of government. Only within very narrow limits can they resist the restrictions on personnel security practices that have been accepted by the OPM and most of the agencies it services. They derive some satisfaction, for example, from the fact that when OPM ruled in 1977 that applicants could no longer be asked whether they were members of the Communist Party or other revolutionary organizations, the Defense Department did not follow suit.

There is nothing they can do, however, about the destruction of the domestic intelligence data base or about the major damage done to federal employee security investigations by the Privacy Act and other privacy legislation. As for their operating budgets, like good soldiers they have been disposed to accept what has been given to them and have tried to do their best in the face of incremental cutbacks that inevitably strike at the integrity of the investigative process. They would be the first to agree that with more staff they could do a better job. But until Congress and the Administration remove some of the restrictions and provide them with the necessary means, about the best we can hope for is the sadly inadequate investigative product we are now getting.

SOME AREAS OF SPECIAL WEAKNESSThe Waiver of Pre-employment Field Investigations for Sensitive Positions

From a personnel security standpoint, one of the most dangerous practices that has established itself over the past two decades is the widespread resort to the waiver of full field investigations prior to filling critical-sensitive positions with applicants or appointees.

Executive Order 10450 provided for the use of such waivers only "in case of emergency"; in each case the head of the agency had to approve the appointment as "necessary in the national interest." The justification universally invoked in defense of this increasingly widespread practice is that the OPM's Division of Personnel Investigation (DPI) generally took from 80 to 110 days to complete the average full field investigation and that this delay greatly complicates the hiring process. In the interest of moving ahead and filling vacant critical-sensitive positions, a majority of the agencies apparently now feel that the cost of leaving such positions unfilled for several months outweighs any risk that may be involved in a post-appointment investigation.

How widespread the waiver practice has now become may be gauged from the following table, reproduced from a survey put out in September 1980 by OPM's Office of Internal Evaluation.

Percentage of Background Investigations Processed Post-Appointment
6-1-80 to 7-15-80

Agriculture	98% (42 of 43 cases)
FCC	100% (2 of 2)
HHS (HEW)	96% (73 of 78)
IDCA (AID)	34% (23 of 68)
Justice - BOP	94% (137 of 146)
Justice - DEA	32% (14 of 44)
NSA*	67% (6 of 9)*
SEC	(no reports during this period)
SBA	90% (9 of 10)
DCT	90% (26 of 29)
VA	100% (4 of 4)

*The percentage given for NSA is really misleading because OPM processes only guard positions for the Agency. NSA processes

the great majority of its own applicants and grants very few waivers for sensitive positions.

When waivers of pre-employment investigations have become the general rule, it is obvious that the heads of the agencies no longer adhere to the requirement that each such appointment be justified as "necessary in the national interest." Nor do they follow the requirement of both OPM and EO 10450 that, where there is a waiver of pre-employment investigation, the request for investigation be filed no later than three days from the day of appointment.

Waivers are bad practice, both from the standpoint of weeding out security risks and the standpoint of weeding out incompetents and criminals and other undesirable elements. It is self-evident that most administrators find it a much more difficult exercise in interpersonal relationships as well as government-employee relationships to dismiss an employee after he has been in the office for two or three months than they would to deny him employment in the first place if a full field investigation turned up information justifying denial or raising serious questions of suitability. In addition, to dismiss someone after appointing him to a sensitive position is also a reflection on the judgment of the selecting administrator. The study from which the above table was reproduced points out that "the three agencies which process a substantial proportion of their Background Investigations reports prior to appointment (IDCA, DEA and NSA), reported making other than a favorable determination at a rate nearly double that of the other eight agencies." (Emphasis in the original.)

The waiver of pre-employment field investigations has over the years been the subject of recurring complaints by officials of the CSC/OPM and the Department of Justice concerned about sound personnel security practices. For example, on March 7, 1972, Robert E. Hampton, Chairman of the CSC, sent a three-page letter to the heads of all agencies strongly criticizing the waiver practice that had become common in many agencies and urging a return to the pre-employment full

field investigation as the normal procedure. The letter quoted the following paragraphs from a communication sent earlier that year by Robert C. Mardian, Assistant Attorney General, Internal Security Division, Department of Justice:

I question the wisdom of such a practice at any time, and I am particularly disturbed that such a practice apparently is being utilized on a fairly widespread basis. The fact that an individual is not permitted access to classified information pending completion of a full field investigation only deals with one aspect of the problem. As you well know, access to classified information is but one of the criteria utilized for designating a position as critical-sensitive. A person in such a position may very well be in a position to make or effect policy decisions of the utmost importance....

The Department of Justice considers it extremely important that applicants for or appointees to critical-sensitive positions receive a full field investigation prior to appointment....

The Hampton letter pointed out to the delinquent agencies that a number of agencies, including the Department of Justice, had resorted to waivers only on rare occasions, and had found it "both feasible and advantageous to conduct pre-employment full field investigations." In addition to the obvious advantages from a security standpoint, the letter said, pre-employment investigations also serve the selection process by helping to develop advance information about general abilities, growth potential, trustworthiness and personal integrity, and other qualities that call for consideration.

But despite the almost universal recognition of the dangers of post-employment investigations, the practice has become more widespread, year by year, until today it has become the norm in many government agencies.

Under its current director, Mr. Peter Garcia, DPI has now reduced the average time requirement for a full field investigation to 73 days and hopes to get it down to 60 days. However, the government agencies queried by the Office of Internal Evaluation indicated that DPI would need to provide 30-day or better service before they would be willing to delay appointments pending completion of investigation.

This attitude on the part of the agencies really begs the question. It must be emphasized again that when we talk of full field "Background Investigations" we are really talking of positions that have been designated "critical-sensitive." For such investigations, it makes no sense to aim for a rigid 30-day deadline. There are many very simple cases that can be processed in 30 days or even less -- especially if the applicants can be persuaded to voluntarily provide copies of their school records, birth records, their divorce papers if they are divorced, and other documents that are not readily available to the investigator, but about whose substance he must seek to be informed. On the other hand there are many very complicated cases involving subjects who have held numerous positions in different cities and different countries. Such cases may require more than 60 days, even with the best of effort. And if adverse information is turned up in the course of the investigation, checking it out carefully in the interest of fairness is a process with unpredictable time requirements. There are no shortcuts to sound personnel security procedures -- as was dramatically demonstrated recently by the forced resignation of Max Hugel, who had been appointed director of CIA's covert intelligence operations after an expedited seven-day background investigation.

Contract Employees in Atomic Energy Installations

The situation in our atomic energy clearance program calls for special consideration because for the most part the installations covered by the program operate with contract employees. The Atomic Energy Act of 1954 requires that all of these employees be the subjects of security checks. The Atomic Energy Commission (Department of Energy and the Nuclear Regulatory Commission) was made responsible for determining the scope of these checks, while the CSC/OPM, under EO 10450, has the responsibility for conducting the security checks. EO 10450 calls for a NACI as the minimum investigation for federal employees. However, in the case of the many thousands of contractor personnel who work

in noncritical-sensitive positions, the Atomic Energy Commission interpreted the Atomic Energy Act as meaning that only government employees had to be covered by NACI's and that other contract personnel at this level could be covered by National Agency Checks only. Such an arrangement, as has been pointed out several times, has become almost completely worthless because of the destruction of virtually the entire domestic intelligence data base.

There are, needless to say, many thousands of critical-sensitive positions in our atomic energy installations that are filled by contract employees. In recent years the filling of such sensitive positions has required an average of approximately 15,000 Background Investigations per year, which represents roughly two out of three of all Background Investigations conducted by the OPM for all government agencies. These investigations are conducted at an average cost today of \$1350 per case, for a total expenditure on personnel security of \$24.3 million. Here again, because of the limitations which affect all sectors of the federal establishment, we wind up with what might be described as a general suitability investigation devoid of any significant national security component.

MEASURES NECESSARY TO REESTABLISH AN EFFECTIVE EMPLOYEE SECURITY PROGRAM

So much damage has been done that, even with the most energetic effort, it is going to be a long and difficult task to recreate a viable Federal Employee Security Program. In the paragraphs that follow we shall examine some of the recommendations that have been made and outline those measures which the author considers essential to the revitalization of the program.

The GAO's Recommendations

Despite a potentially harmful overemphasis on cost-cutting and efficiency and inadequate emphasis on quality, the Government Accounting Office in a series of reports has made some recommendations that merit attention. In its last report ("Costs of Federal Employee Security Investigations Could and Should Be

Cut") dated August 31, 1979, the GAO recommended "that the Congress consolidate into one law the authority to investigate and judge the suitability of federal employees, including the potential of employees in sensitive positions to impair national security." It also said that Congress should consider:

- Restrictions imposed on personnel investigations by other laws such as the Privacy Act of 1974 and court decisions protecting individuals' constitutional rights.
- Whether OPM should investigate occupants of nonsensitive positions only to determine prior criminal conduct, leaving to employing agencies the responsibility for assessing applicants' efficiency.
- The need to define, in a manner acceptable to the courts, disloyal acts which should bar federal employment.
- The scope of investigation needed for the several levels of security clearances granted federal employees.
- Whether there is a need in the legislation for provisions to aid OPM in gathering local law enforcement information; for example, reimbursing local law enforcement agencies for supplying information, receiving assistance from federal law enforcement agencies, or clarifying OPM's legal authority to have local arrest information.

These recommendations had originally been offered in a previous report by GAO. GAO had also recommended in a prior report that, in the interests of economy and the application of uniform investigative standards, consideration be given to consolidating personnel investigations under one agency. In its August 31, 1979 report it seems to have backed off somewhat from this last position. On the one hand, it points out that "costs may increase as a result of consolidation because some agencies have indicated a strong desire to retain their investigators for other work, and the Office of Personnel Management may need more staff." On the other hand, it appears to have been impressed by the resistance to the consolidation proposal offered by most of the agencies that today conduct all or even some of their own investigations. These include the Department of State, the FBI, the Bureau of Engraving and Printing, and the constituent ^{law enforcement} agencies ~~The Secret Service, the~~ of the Treasury such as the IRS, Customs Service and the Bureau of Alcohol, Tobacco and Firearms. "These agencies," said the 1979 report, "explain that

their positions required special investigative work and that their investigators were more qualified and had access to more criminal and fiduciary records than OPM." While this may very well be true with regard to criminal and fiduciary matters, it is probably not true with regard to the experience of their investigators in the national security field.

While conceding that applicants for certain sensitive positions today undergo inadequate investigation, the GAO report argued that in many cases the degree of investigation exceeds the requirement of the position and that much money could be saved by abbreviating and streamlining investigations, encouraging the sharing of investigative resources by the federal agencies and by having OPM adopt some of the demonstrated improvements that have already undergone testing in other agencies. Finally, it urged that OPM move to develop adequate classification criteria -- that is, criteria defining which positions require which degree of investigation.

The OPM's Proposed Changes

In response to the GAO report, the OPM set up an interagency task force to study the implementation of the GAO recommendations. The task force report, which is now being finalized, will center around a proposal for a new five-level system for designating the sensitivity of federal positions. As has been pointed out, OPM and the other government agencies conducting investigations currently operate on the basis of a three-level system in which the designations are nonsensitive, noncritical-sensitive and critical-sensitive. The chart on the following page lists, in the words of the report, the five levels of the proposed system and the degree of investigation proposed for each level.

	<u>LEVEL OF RISK</u>	<u>REQUIRED INVESTIGATION</u>
LEVEL I	Opportunity for effecting <u>limited but reversible</u> damage to the national interest	National Agency Check (NAC)
LEVEL II	Opportunity for effecting significant <u>but reversible</u> damage to the national interest. (Level II has access to national defense materials through Secret.)	National Agency Check and Inquiries (NACI), supplemented by a credit check for financial type positions.
LEVEL III	Opportunity for effecting <u>serious but generally reversible</u> damage to the national interest. (Involves duties concerning matters of considerable importance to the national defense; rights and interests of individuals; protection of property and lives; enforcement of federal laws, regulations or rules...; or the economic well-being of the nation)	Basic NAC plus Limited Background Investigation (LBI), involving one year personal coverage plus four years' written inquiry plus credit check. Intensive coverage for the most recent year to include in-person interview of a minimum of three knowledgeable witnesses
LEVEL IV	Opportunity for effecting <u>exceptionally grave, not easily reversible</u> damage to the national interest. (Involves duties concerning matters of clearly major importance to the national defense, with access through Top Secret; rights and interests of individuals; protection of lives; enforcement of federal laws; economic well-being of the nation; general public safety and internal security; or continued effectiveness and integrity of the federal service)	Basic NAC plus Background Investigation (BI) of five years' scope, or back to age 18, with at least three years' coverage. Credit check
LEVEL V	Opportunity for effecting <u>inestimable, not easily reversible</u> , damage to the government's ability to effectively conduct the public's business domestically; retain the public's confidence and trust; defend the nation from foreign aggression; carry out the nation's foreign policy objectives; or protect against internal subversion, espionage, sabotage or other illegal acts which threaten the public's safety or internal security of the nation	Basic NAC plus Special Background Investigation (SBI) of 15 years' scope, or back to 18th birthday. Fifteen-year employment check; five-year credit check; five-year residence check; 15-year education check, including three years' personal coverage; five-year foreign travel check, plus full coverage for overseas residences of more than five years

It was the thinking of the task force that the vehicle for implementing the new five-level system should be a new Executive order to replace Executive Order 10450, as amended, which is, by general consent, now outdated. The task force also felt that in anticipation of a new Executive order, the participating agencies should move immediately to implement the new five-level system.

It is clear that there is widespread support for the five-level system. Certainly, a 15-year background check appears in order for Level V positions, and the degree of investigation required in the case of Level IV also appears adequate. But old hands in the field of personnel security share the opinion that the degree of investigation called for in the cases of Levels I, II and III is inadequate. In particular, they express misgivings about the proposal to reduce the NACI to a NAC in the case of Level I positions. Foregoing written inquiries, they point out, would make it impossible to find out whether the subject is who he claims he is, or has lived where he said he lived, or has done what he said he has done.

Serious consideration should be given to firming up the investigative procedures in the proposed five-level system by

- increasing the NAC to a NACI in the case of Level I
- adding an in-depth subject interview to the NACI in the case of Level II
- Substituting a standard Background Investigation (BI) in the case of Level III
- adding an in-depth subject interview to the Background Investigation in the case of Level IV
- adding an in-depth subject interview to the Special Background Investigation (SBI) in the case of Level V.

Subject interviews, it should be pointed out, have been found to be particularly effective by the State Department, the intelligence agencies and the Defense Department.

The Essential Requirements

While the GAO and OPM proposals have much merit, they do not address two of the central elements essential to the implementation of an effective Federal Employee Security Program. The first is the lack of guidelines for agency directors, adjudicators, and investigators; and the second is the destruction of the domestic intelligence data base at the federal, state and local levels, and the virtual cessation of all domestic intelligence activities.

The paragraphs that follow set forth the minimum essential requirements for the restoration of a meaningful Federal Employee Security Program.

1. The guidelines for adjudicators and agency heads which exist today -- to the extent that any exist -- are vague and ambiguous, often contradictory, and leave so much open to interpretation that investigators, who are naturally fearful of committing a transgression against rules they do not understand, frequently tend to avoid negative reports out of the fear that they may get themselves into trouble. An investigator is always safe if he compiles no adverse information bearing on loyalty about the applicants he is assigned to check out. But if he pursues his investigation conscientiously and reports adverse information as it is given to him -- especially information of a national security nature -- he enters an area of undefined risks, which have now been enhanced by the Jane Doe decision.

It is not sufficient for the rules governing disqualification to speak in general terms about membership in or a relationship with "any foreign or domestic organization, association, movement, groups or combination of persons which is totalitarian, fascist, communist or subversive, or which has adopted, or shows, a policy of advocating the commission of acts of force or violence to deny other persons their rights under the Constitution of the United States, or which seeks to alter the form of government of the United States by unconstitutional means." Adjudicators and agency directors cannot be expected to accept the responsibility

for interpreting this general language in a manner which covers the hundreds of organizational affiliations that may come to light as a result of applicant investigations. They have to be provided -- presumably by the Department of Justice -- with specific and authoritative and constantly updated guidelines, setting forth the essential facts about those organizations in which membership would automatically raise questions about the applicants' loyalty and reliability.

2. As matters stand today, the FBI has withdrawn from the internal security activities to the point where it is no longer monitoring and clipping extremist publications. In order to enable the Attorney General to provide such guidelines and in order to provide meaningful replies in response to National Agency Checks, the FBI will have to be instructed to resume the active monitoring of extremist organizations of the far right and far left -- those which are committed to the revolutionary overthrow of our society and/or are controlled or substantially influenced by hostile foreign governments; those which are committed to the use of violence to deny our citizens their constitutional rights; and those organizations which, at any given period, according to the best judgment of the Department of Justice, pose a serious danger to domestic tranquility.

In order to avoid indefinite delays, the organizations initially to be targeted should be designated by the Attorney General, in consultation with the FBI -- with the provision that the review procedures outlined in the previous section be implemented within a stipulated time-frame.

3. In addition, in order to provide it with an in-house research and analysis capability, the Office of Personnel Management will have to reconstitute the Security Research and Analysis Section which served the Civil Service Commission well for many years, and reactivate and update its research files, which are now in storage.

4. The Office of Personnel Management can also do a good deal to bring about an early improvement in the situation by promulgating new directives which

have the effect of nullifying at least the more questionable of the restrictive directives put out by the Civil Service Commission and the OPM on the advice of Counsel in recent years. Obviously, these new directives would have to be in compliance with Supreme Court decisions, but, where doubt exists, the issue should be resolved on the side of improved personnel security. No concession should be made to diminished personnel security procedures unless these concessions are specifically ordered by the courts.

5. The Office of Personnel Management and the Justice Department must team up to represent the interests of the Federal Employee Security Program before the courts far more vigorously and effectively than they have heretofore done. There are admittedly some points where privacy rights come into conflict with the right of the government to safeguard itself against the danger of infiltration by elements who are ideologically committed to its destruction or are in the service of hostile intelligence. The problem is to strike a balance between these two "rights." If privacy rights are zealously represented in a whole series of court cases related to the Federal Employee Security Program, and if there is no comparably forceful presentation of the security requirements and rights of the United States government, inevitably the judges are going to come down on the side of absolute privacy.

6. The Freedom of Information Act and the Privacy Act will have to be amended in a manner which exempts from disclosure information provided to the federal government in connection with the investigation of applicants and appointees for federal positions. The GAO report already quoted underscored the difficulty of obtaining information both from institutions and from members of the public when they are advised, as they must be, that any information they provide may be made available to the applicant or appointee under the Privacy Act or the Freedom of Information Act. Even federal judges informed the GAO that, if they possessed adverse information about an applicant, they would not make this information

available to government investigators because of the knowledge that it could be released in response to a privacy petition.

The argument will unquestionably be made that such an exemption might open the way to denunciations of applicants and appointees on various grounds by neighbors or acquaintances who are motivated to do them harm. There are two answers to this criticism.

The first answer is that, without such an exemption, it will be impossible to operate an effective personnel security program. The second answer is that the nature of the investigative process by itself would be enough to nullify the testimony of a single vindictive witness. If 20 people who are interviewed in connection with an application for federal employment have only affirmative things to say about the applicant, and if a solitary interviewee against this record were to come up with some serious adverse information, it is virtually inconceivable that this one piece of adverse testimony, in the absence of confirmation from any other source, would serve to disqualify the applicant. Indeed, any competent investigator, when confronted with such information, would immediately ask whether there was proof available from other sources to confirm the allegations.

The argument will also be made that, unless applicants for government employment are given access to derogatory information which might serve to disqualify them, due process will be impossible. This matter we have already discussed in the section on the Jane Doe decision. Clearly, every applicant should be entitled to know, as precisely as possible, the content of any disqualifying derogatory testimony so that he will be in a position to respond to it. The question is whether due process cannot be observed by providing the applicant with a summary of the derogatory information and inviting his response -- in addition to which, he already has the right to appeal an adverse decision to a board of arbiters.

7. The implementation of a more effective Federal Employee Security Program not only requires more investigators than are presently servicing the various agencies but also calls for more intensive training of investigators and adjudicators. The Project 10 Report of February 1975 placed very heavy emphasis on the matter of training. In the case of investigators, it called for a minimum of two weeks of formal classroom instruction and on-the-job training encompassing at least the first year of duty. This was to include "an initial period during which the trainee accompanies an experienced investigator to learn by example; a succeeding period during which the trainee is accompanied by an experienced investigator who observes his work and coaches him on proper technique and approach; a period of close review of completed work, tapering off as the trainee gains experience; frequent supervisory consultations on the trainee's progress"; participation with other trainees in periodic conferences; and repeated refresher training courses.

The proposed investigator training program outlined by the Project 10 Report was almost encyclopedic in its coverage. It included general indoctrination on the agency investigative mission and the government-wide investigations program; full field Background Investigations; information sources, witness selection and interviewing techniques; treatment of loyalty-security issues; subject interviews; prohibited areas of inquiry or practice; constitutional rights, civil rights and privacy considerations; suitability and misconduct investigations; indoctrination in adjudication principles; work planning, office procedures and travel and mileage conservation; investigatory attitudes, appearance and conduct; and practice sessions in interviewing and reporting.

The Project 10 Report also discussed at length the question of adjudicator qualifications and training. Adjudicators perform a function of very great importance. If they are unqualified or inadequately trained, they may make personnel decisions which are potentially damaging to the national security.

Conversely, an ill-prepared adjudicator may do injury to the rights of applicants because he does not know how to evaluate the evidence provided by the investigative staff. Most of the government agencies surveyed reported that they did not require prior training of adjudicators, that they received their training on the job. In addition, the survey conducted revealed no discernible uniform pattern of supervision for adjudicators. The Report recommended that persons selected as adjudicators should not only possess in high degree the attributes of integrity, maturity of judgment, objectivity and discretion, but that they should have "varied experience in investigations, security, suitability, or fields requiring significant skills in the organization and evaluation of evidence; a familiarity with the legal framework within which adjudications are conducted; and a "general knowledge of subversive organizations, their ideologies, sources of information on these organizations, and hostile intelligence techniques." The Report also recommended that all adjudicators be required to attend an intensive basic training course in adjudication and that an effort be made to standardize adjudicator selection criteria, training and supervision.

Needless to say, investigator training and the selection, training and supervision of adjudicators fall far behind the quality recommended by Project 10.

8. The reconstitution of the domestic intelligence data base, housed primarily in the FBI and the OPM, will of course be impossible unless precise guidelines are established designating those organizations which pose a threat to the national security and domestic tranquility. It is to be noted that, under present laws, past membership or even current membership in such an organization would not be sufficient to bar an applicant from employment; it would be one of a number of factors to be considered. But membership would raise the possibility of a finding of unsuitability, especially where sensitive positions are involved.

There have been no such guidelines since the Attorney General's List (originally established by President Truman in March 1947 through Executive Order 9835) was abolished in June 1974. There was general agreement long before the List's abolition that it was outdated, that its quality was uneven, and that the procedure involved was highly questionable because organizations could be "designated" by the Attorney General without an independent hearing at which they could, if they wished, challenge the accuracy of the "designation." But the demise of the Attorney General's List left a void that must somehow be filled if the Federal Employee Security Program is to be reconstituted.

Francis W. Niland, in the study already quoted*, reports on an interview he had with Robert Keuch, Deputy Assistant Attorney General for the Justice Department's Criminal Division, which focused on the problem of guidelines. Keuch told him that in 1969-1971 the Internal Security Division of the Department of Justice had sought to amend EO 10450 in a manner that would have transferred the "designation" function from the Attorney General to the Subversive Activities Control Board. The proposal provided, said Mr. Niland, "that the SACB, after full notice and hearing, would make recommendations to the Attorney General concerning those organizations that should be listed pursuant to the provisions of the executive order." The SACB would then hold such hearings and make such findings only upon a petition by the Attorney General. Most importantly, the proposed executive order would have set forth definitions for the organizational characterizations already contained in EO 10450; that is, totalitarian, Fascist, Communist and subversive. It would have provided further a new classification of organization to be considered -- violent-action oriented organizations, which would be appropriately defined."

*Francis W. Niland, The Present Dilemma of the Federal Employee Loyalty/Security Program (Washington, D.C.: The National War College, May 1977)

Mr. Keuch expressed the opinion that an appropriate manner in which to handle the problem of "designation" would be to set up a separate Board under the Domestic Council which would function in much the same manner as the SACB did under EO 10450 -- which meant that there would be open hearings before any organization was "designated." His proposal also provided for "delisting" hearings to be held in the case of organizations which had evolved away from those characteristics that led to their original "designation." Keuch apparently believed that his proposal still had merit at the time of the interview.

The Keuch concept in several respects is superior to the Attorney General's List as a vehicle for establishing loyalty-security guidelines. In the interest of making the proposal operational in a reasonable period of time, it might be necessary to provide for provisional designations, subject to a later hearing and review. What is certain is that, without the development of explicit guidelines, there will be no reconstitution of the domestic intelligence data base and there will be no meaningful Federal Employee Security Program.

9. The Civil Service Commission witnesses who appeared before the Senate Subcommittee on Criminal Law in 1978 made the point that over the previous ten years not a single applicant had been denied appointment to the federal service on the basis of reasonable doubt as to loyalty, and that from 1956 to 1968 only 12 applicants had been denied employment on this basis. This, they said, was because of a reluctance over the entire history of the Federal Employee Security Program to stigmatize individuals as "loyalty risks" or "security risks." There were, however, over 500 applicants who were denied employment and employees who were dismissed on general suitability grounds, when the real reason was the existence of serious doubt as to loyalty.

Many years ago some of the hardest heads in the Federal Employee Security Program had come to the conclusion that it was self-defeating to deny employment on findings that an applicant was a "loyalty risk" or "security risk." They

proposed, instead, that applicants should be rated either "suitable" or "unsuitable." An applicant could be unsuitable for reasons related to insubordination or inadequate performance or a criminal background record; or he could be unsuitable because he was a chronic drunk or a sexual pervert or a person afflicted with wanton carelessness -- someone, in short, whose personal conduct under the old rules would have stigmatized him as a "security risk"; or he could be unsuitable because of membership in or a sympathetic association with Fascist, Communist or other subversive organizations or of organizations committed to the use of force or violence to deny other citizens their constitutional rights. The various reasons justifying rejection of the applicant would have to be separately and specifically set forth. The applicant would have to be informed of the charges or allegations and provided with an opportunity to defend himself, and with a further opportunity to appeal if he is turned down. But an adverse determination would simply state that the applicant had been found "unsuitable" for federal employment -- not that he had been turned down as a "loyalty risk" or "security risk."

10. The Justice Department has sent to Congress an alternative draft of a bill amending the Federal Torts Claims Act which would relieve federal employees, including investigators, adjudicators, and administrators, from personal liability if they have acted in good faith. It is urgent that this measure be enacted in order to undo the damage done by the Jane Doe decision.

11. The GAO report of 1978 discussed the possibility of legislation which would compel the cooperation of state and local authorities with the OPM, the DOD, and other government agencies in the matter of personnel investigations. The GAO also suggested the possibility of offering to compensate them on a per capita basis for the cost of this cooperation. The enactment of such legislation would unquestionably result in a marked enhancement in the cooperation of state and local officials.

12. There is a need for a blue ribbon panel similar to the Lloyd Wright Commission set up in 1955. It ordinarily takes a very long time for such a commission to conduct an in-depth inquiry and draft a report. Because of the urgency of the situation, perhaps it would not be inappropriate to suggest that the commission be instructed to submit its report six months after it begins its deliberations.

In anticipation of the establishment of such a blue ribbon panel, the newly established Senate Subcommittee on Security and Terrorism might consider the advisability of taking testimony from those who have knowledge of the situation for the purpose of calling the problem to the attention of Congress and the public.

13. The author's final recommendation, which, in terms of operational sequence, would probably come first, has to do with presidential initiative. In discussing the erosion of the Federal Employee Security Program with the author, the recent director of the employee security office in a major federal agency expressed the conviction that the program had been going downhill for the past 20 years or more because no President since Eisenhower and Truman has manifested a strong personal interest in the situation. If the negative or indifferent attitude of so many government bureaucrats towards personnel security is ever to be transformed into a positive attitude, it is mandatory that President Reagan speak out on the issue and promulgate rules facilitating the restoration of the program.

From the Newsletter of
The Association of Federal Investigators

MEET JANE DOE

A recent federal district court decision, *Jane Doe v. U.S. Civil Service Commission* (S.D.N.Y. Jan 16, 1980), has far-reaching and in some respects disturbing implications for federal investigators. While its basic effect is to extend the hearing rights of the subjects of personnel background investigations, the decision also continues the trend of holding individual investigators and officials liable for actions performed in an official capacity. It also limits further the conditions under which the identities of confidential sources may be protected from disclosure.

Jane Doe was an applicant for a White House Fellowship. As part of the selection process, a full field investigation was run on her by the Civil Service Commission. Two of 35 sources contacted provided unfavorable information regarding her behavior in college, and Ms. Doe was not selected for the fellowship. She obtained her investigative record under the Privacy Act and subsequently requested deletion of the unfavorable information on the grounds of inaccuracy. She supported her request with testimonials to her good character. The CSC denied her request, and when she

appealed, the CSC recontacted the two sources of unfavorable information in a reconsideration of her case. The sources stuck to their stories, but refused to allow their identities to be revealed.

The CSC denied her appeal, and in January 1978, Jane Doe filed suit. Among other things, she claimed the following: 1) The CSC was in violation of the Privacy Act in that it failed to maintain accurate records. 2) The CSC violated her constitutional right of privacy and due process, and also acted arbitrarily and capriciously, by not allowing her an opportunity to refute the unfavorable allegations before they were put in her file and became a basis of adverse personnel actions. 3) The CSC's refusal to identify the sources of unfavorable information while at the same time refusing to expunge it, violated due process of law. And, 4) she was entitled to compensation for damages from the Civil Service Commission officials who had denied her request in their individual capacities.

In an opinion announced January of this year, the court held that where controverted, derogatory information

(continued on page 4)

Meet Jane Doe—from previous page

about the individual is incorporated in a Government investigatory file that will be released to others and that will threaten future employment opportunities, the Government has two alternatives. It must either provide the individual with a hearing to rebut the information prior to its dissemination and to confront the people who provided the information, or it must delete the challenged information prior to the dissemination of such a file.

In Ms. Doe's case the court found that the constitutional due process protection was "triggered" by a stigma resting on two conditions. The first was that information submitted by Ms. Doe indicated that the "unfavorable information was false, and the second was that the information had been publically disseminated and "memorialized" in a form that could be retrieved by other federal agencies. The court ruled that "the protection of the due process clause prohibits the Government from depriving an individual of Government employment on the basis of false charges, and then aggravating the injury and further diminishing employment opportunities by tarnishing the individual's name and reputation."

The court also decided monetary damages were appropriate and Jane Doe has a cause of action against the individually named defendants because there was no alternative means of securing total relief. Because it was not in effect during many of the events in question, the Privacy Act could not be used to provide Ms. Doe with damage relief she sought. It is not clear at this point what effect the remedies provided by the Privacy Act will have on individual liability in civil matters with respect to cases occurring now. However, a May 1980 Supreme Court decision, *Carlson v. Green*, indicates that the existence of an alternative remedy is not determinative with respect to officials' individual liability. The matter appears to rest on the intent of Congress in providing an alternative remedy, such as the Privacy Act.

The judge also held that Jane Doe's need for confrontation with the sources of unfavorable information could outweigh the interest served by common law and Privacy Act protection of their identities. Since the Civil Service Commission would neither remove the unfavorable information from her record nor recognize that other favorable information submitted by Ms. Doe outweighed its probative value, the court ruled that the Commission must permit her to confront and question the individuals who made the allegations. However, had the CSC decided that Ms. Doe's information cast enough doubt on the unfavorable information to delete it, the sources would not have to be identified. The implication appears to be that if unfavorable information is to be used in the adjudication of personnel investigations, its source must be willing at some point to be identified and face the person accused.

The implications of this decision for investigators, adjudicators and all other officials who use or maintain background investigations are not yet clear. Officials of the Office of Personnel Management (formerly CSC) are now developing policy guidelines. It is expected that in the next edition of this Newsletter, we will have an article on the new policies and procedures. More detailed information may currently be found in a memorandum from OPM

-85-

Director Alan K. Campbell to Department of Agency Heads, *Jane Doe v. U.S. Civil Service Commission*, dated 23 May 1980. The case may be found at 483 F. Supp. 539. (S.D.N.Y. Jan 16, 1980).

The principle of individual liability in federal investigations has expanded since it was recognized in 1971 (*Bivens v. Six Unknown Named Agents of the Federal Bureau of Narcotics*, 403 U.S. 388.) Although *Harper v. Bruce*, 478 F. Supp. 176 (D.D.C. 1979) extended it to personnel actions, *Jane Doe* is the first time individual liability has been held to exist in a case involving stigma and due process. Although action in "good faith" is generally thought to be a defense in these matters, it can only be used by an investigator or official already involved in litigation.

The obligation to provide the subject of a suitability investigation with the protection of due process appears to open up all procedural complexities that now surround the treatment of a subject of a criminal investigation. This may prove to be a Pandora's Box, the contents of which can only be imagined. This decision will surely motivate other litigation citing the due process obligation, and the courts will be faced with the task of making articulated case law in the area of personnel investigations similar to that grown up since 1930 protecting the rights of a criminal suspect.

There would seem little doubt that the extension of liability of the individual investigator and the further restriction of the conditions under which the identity of confidential sources may be protected will have a chilling effect on suitability investigations. If a significant protection of government interests is to continue in this area, we may have to look to experimental innovations such as increased subject interviews, centralized adjudication, etc., and hope they will prove effective.

In the area of individual agent liability, some kind of legislative protection seems long overdue. An investigator or adjudicator acting in good faith within established policies and guidelines should incur liability only as an agent of the government.

The Association of Federal Investigators has always stood for absolute fairness in federal investigations and the decisions based on them. The privacy and other interests of the subject of an investigation is a professional trust to be respected by the investigator as much as any other consideration. But, we must not easily turn from our obligation to informants and other sources; their essential contribution is also based on trust that must be respected. And, we should remember that the federal investigator's job is essentially to protect the government and the public it serves. It is difficult to discern priorities clearly where sometimes antithetical interests exist.

A great deal of progress has been made in recent years to protect interests of the individual. We can only hope that we don't try to move too far too fast. If the government is rendered significantly more vulnerable to fraud, corruption, compromise or other abuse because of a weakened personnel security system, then we will have thrown out the baby with the bathwater.

Written by Everett E. Mann, Former Executive Committee member and author of our Legislative Watch column.

APPENDIX II

Cost of Personnel Investigations, By Agency

(Taken from GAO report "Costs of Federal Personnel Security Investigations Could and Should be Cut," August 31, 1979)

Agency and type of investigation	Number of investigations	Cost per investigation (note a)
	FY 1978	
OPH:		
Full-field investigations	23,760	\$ 836.00
Limited field investigations	2,477	458.00
NACI	270,148	8.81
NAC	<u>59,761</u>	7.25
Total	<u>356,146</u>	
DIS:		
Special background	48,572	394.00
Background	57,723	208.00
Special background—update investigation	12,747	108.00
Background—update investigation	1,300	178.00
Expanded NAC	21,826	60.00
Special investigative inquiries	1,934	-
Limited inquiries	2,357	-
NAC	364,343	3.57
Entrance NAC	<u>391,437</u>	
Total	<u>902,239</u>	
FBI:		
Administrative Services Section:		
Special agent	1,057	b/ 5,452.00
FBI support	c/ 3,000	-
Maintenance, contractors, vendors with access to Hoover Building	c/ d/ 1,000	-
Civil Rights and Special Inquiries Section:		
Nonreimbursable full-field investigation	2,173	-
Reimbursable full-field investigations	1,579	979.00
National FBI Academy:		
Limited full-field investigation of candidates	c/ 1,200	500.00
Total	<u>10,009</u>	

Agency and type of investigation	Number of investigation	Cost per investigation (note a)
FY 1978		
Department of Treasury:		
IRS:		
Security (full-field investigation)	39	\$1,058.00
Character	4,312	1,095.00
Limited character (note e)	6,881	194.00
Security—clearance	46	
Security—5-year update investigation	4	\$/ 276.00
Preappointment	217	
NACI	380	
Police check	197	
Enrollee applicant	1,374	34.00
Total	13,450	
Customs Services (note g):		
Full-field investigation	1,796	700.00
Bureau of Alcohol, Tobacco and Firearms:		
Full-field investigation	432	242.13
Update investigation	375	-
Total	807	
Bureau of Engraving and Printing:		
Full-field investigation	112	250.00
Update investigation	11	-
Total	123	
Secret Service:		
Full-field investigation	600	750.00
Update investigation	1,200	225.00
Total	1,800	
Department of State:		
Full-field investigation	2,630	613.00
Update investigation	245	-
Total	2,875	
U.S. Postal Service:		
Full-field investigation	1,516	-
Update investigation	893	-
Total	2,409	

<u>Agency and type of investigation.</u>	<u>Number of investigations</u>	<u>Cost per investigation (note a)</u>
	<u>FY 1978</u>	
Coast Guard (note h): Background investigation	<u>147</u>	-
Department of Commerce: Full-field investigation	<u>2</u>	-
National Aeronautics and Space Administration: Full-field investigation	<u>1</u>	-
Agency for International Development: Full-field investigation	356	630.00
NACI and NAC	<u>654</u>	-
Total	<u>1,010</u>	
ACTION:		
Full-field investigation	50	300.00
Update investigation	<u>5</u>	-
Total	<u>55</u>	

a/Includes actual or estimated costs.

b/Includes recruiting, testing, physical examination, and full-field investigation.

c/Estimated.

d/Persons with regular access to the FBI building receive full-field investigations. Persons with limited access receive NACIs.

e/Limited character investigation for nonsensitive (specified) positions is scheduled to be eliminated. Positions will be reclassified as nonsensitive and OPM will conduct a NACI for IRS.

f/The total for these five types of investigations is 844. The \$276 is the average cost per investigation.

g/A limited full-field investigation was added in January 1979 for non-critical sensitive positions.

h/Military personnel only.

NON-ADP POSITIONS [Federal Civilian Service]

	<u>NUMBER OF OLD POSITIONS</u> <u>(Excluding ADP)</u>	<u>NUMBER NEW POSITIONS</u> <u>(Excluding ADP)</u>	<u>% AT EACH</u> <u>OF NEW LEVELS</u>
NONSENSITIVE	1,349,210	I 1,075,348	69%
NONCRITICAL- SENSITIVE	128,010	II 346,474	22%
CRITICAL- SENSITIVE	48,499	III 67,646	4%
NORMAL		IV 40,213	3%
5 YEAR BI		V 19,292	2%
CRITICAL- SENSITIVE MORE THAN 5 YEAR BI	23,254		

- 1/ DoD estimates included civilian positions as well as military and contractor activities. A breakdown of civilian positions from the DoD total was not available. State and CIA did not provide estimates.

QUESTION-AND-ANSWER SECTION

ADDITIONAL QUESTIONS TO AND RESPONSES FROM THE GSA

Additional Questions Submitted to GSA

1. In your testimony, you stated that access to the files would be restricted for 75 years under NARS general restrictions. Please explain that statement in more detail, especially as it relates to the files which are the subject of this hearing.
2. Please submit copies of approved requests for records dispositions and any other supporting documents for the events identified in the chronology which was submitted as a part of your prepared statement.
3. What information is maintained in the disposal dossier you keep at the office with reference to the records which are the subject of this hearing? Please furnish a copy of that information if it is not duplicated in any other material which you are sending us.
4. Please provide any information or documents concerning the investigation and study which was done in 1960 when the 30 year retention schedule was set.

5. In your testimony, you stated that "Maybe more recent files would be of some difference,..." Are the files such that the more recent files, say for the period 1940 to date, could be identified and separated from the older files? If not, what process would be required to accomplish this identification and separation?
6. What would be the number or percent of the files that you would recommend be examined in order to ascertain whether these files have historical, national security or other value sufficient to warrant retention?
7. In your testimony you state that you believe that OPM should work with Archives to make certain that there are no national security implications before disposal. Would it be correct to infer from this statement that Archives cannot state with certainty at the present time that these files or any part thereof have no national security value or implications?
8. What would be the position of GSA with regard to a proposal that the individual files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
9. What would be the position of GSA with regard to a proposal that the organizational files and its index be turned over to the FBI for its use in its national security/loyalty investigations?



General
Services
Administration

Washington, DC 20405

Honorable Jeremiah Denton
Chairman, Subcommittee on Security and Terrorism
Committee on the Judiciary
United States Senate
Washington, DC 20510

Dear Senator Denton:

I am pleased that the October 5, 1981, testimony of the Archivist of the United States and his staff regarding the disposition of 20,000 cubic feet of Civil Service Commission personnel security investigative case files for the years 1928-1959 proved so helpful and informative to the Subcommittee.

Enclosed is the additional information you requested on these matters. If we can be of further assistance, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ray R. Hunt', written over the word 'Sincerely,'.

Enclosures

Question 1: Access to the files would be restricted for 75 years.

The National Archives and Records Service has always sought to balance the need to restrict access to accessioned records containing information that would violate the personal privacy of some individual, while assuring ultimate release of all records in their custody. The determination of what information invades personal privacy, and for how long, has always required a difficult judgment by archivists. The importance of making that judgment was recently highlighted by passage of the Privacy Act. In 1975 a NARS task force drafted a general restriction on privacy which was designed specifically to reemphasize NARS' determination to protect personal privacy, as well as NARS' obligation under the Federal Records Act to make permanently valuable records available for research. A 1978 revision of the Federal Records Act authorizes the Archivist to make records available after 30 years unless additional restrictions are warranted.

To provide practical guidance to NARS' staff and researchers, the privacy restriction referred to information of a highly personal nature about "living" individuals. The 75 year restriction was intended to strike the elusive balance between protecting sensitive personal information and making all accessioned records available for research at some specified time. Protecting this information for 75 years would normally prevent the release of personal information during an individual's lifetime.

We believe that the OPM case files, 1928-1959, clearly fall within the purview of our privacy restriction and that the withholding of those files would be fully authorized under exemptions (b)(6) and (b)(7)(c) of the FOIA, as amended.

Question 2. Documents referred to in chronology, October 5, 1981 (copies enclosed)

<u>Chronology item</u>	<u>Document(s)</u>
1.	NARS Disposition Job No. II-NNA-3152 (see related documents catalogued under Question 3 below).
2.	SF 135, documenting transfer of investigation case files, 1928-1959, to the Federal Records Center (see also Question 3 below for related documents).
3.	Senate Resolution 21, 94th Congress, 1st Session, and letter of transmittal dated February 7, 1975.
4.	NARS Disposition Job No. NC-146-76-1.
5.	Civil Service Commission Administrative Manual Supplement (AMS) 44-3; also NARS Disposition Job No. NC1-146-77-1 (nb: comment in MW Livingston memorandum dated May 14, 1976).
6.	Letter dated December 21, 1977 from the Senate Select Committee on Intelligence, lifting moratorium imposed by Senate Resolution 21, 94th Congress, 1st Session.
7.	Letter from Senators Thurmond and Eastland to CSC dated March 1, 1978 (see Question 3 below for CSC reply).
8.	NARS Disposition Job No. NC1-146-81-1.
9.	Letter from Dr. Warner to Senator Thurmond dated June 1, 1981.
10.	Letter from Senator Thurmond to Mr. Scaboo dated June 9, 1981.

CHRONOLOGY

1. January 19, 1960. NARS approved the disposition of Central Office Investigation Case Files 30 years after date of last action pursuant to NARS Disposal Job No. II-NNA-3152.
2. November 2, 1960. Investigation case files, totaling 19,985 cubic feet and dated from 1928 to 1959, transferred to the Federal Records Center, November 2, 1960, under authority of II-NNA-3152. Records were arranged alphabetically in multi-year segments effectively barring systematic disposal of the files. The cost to identify and screen the individual files which were eligible for disposal was prohibitive. NARS therefore elected to hold the entire collection for the 30 year period.
3. January 27, 1975. Senate Resolution 21, 94th Congress, 1st Session, imposed moratorium on disposal of investigative records. Provisions applied to CSC personnel investigative case files stored at the Washington National Records Center.
4. July 22, 1975. Disposition schedule for investigative case files reduced to 20 years pursuant to NARS Disposal Job No. NC-146-76-1. Disposition of security investigations index was also approved. The index would be destroyed 20 years after date of last action.
5. August 1, 1977. Disposition schedules incorporated in CSC Administrative Manual Supplement (AMS) 44-3, Disposition of Records, pursuant to NARS Disposal Job No. NC1-146-77-1.
6. December 21, 1979. Moratorium imposed by Senate Resolution 21 lifted.
7. March 1, 1978. Letter from Senators Thurmond and Eastland requests CSC to postpone destruction of files pending completion of Committee study of Federal Loyalty - Security Program. The total volume of frozen records exceeds 40,000 cubic feet.
8. April 30, 1981. Disposition schedule for investigative case files reduced to 15 years at the request of OPM pursuant to Disposal Job No. NC1-146-81-1.
9. June 1, 1981. Letter from Dr. Warner, Archivist of the United States, to Senator Thurmond requesting concurrence in disposal of 1928-1959 records at the Washington National Records Center.
10. June 9, 1981. Letter from Senator Thurmond to George Scaboo, Acting Assistant Archivist for Federal Records Centers, stating Committee's intention to study the matter and requesting continued retention of the records.

Standard Form No. 115
Revised November 1951
Prescribed by General Services
Administration
GSA Reg. 5-19-115

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
2010 NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON 25, D. C.

1. FROM (AGENCY OR ESTABLISHMENT)
U. S. Civil Service Commission

2. MAJOR SUBDIVISION
Central Office

3. MINOR SUBDIVISION
Investigations Division

4. NAME OF PERSON WITH WHOM TO CONFER
Carlton A. Gloyd

5. CERTIFICATE OF AGENCY REPRESENTATIVE
I hereby certify that I am authorized to act for the head of this agency in matters pertaining to the disposal of records, and that the records described in this request are not needed for the conduct of the agency's business.

6. The records have been examined and found to be of sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

7. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

8. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

9. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

10. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

11. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

12. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

13. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

14. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

15. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

16. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

17. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

18. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

19. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

20. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

21. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

22. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

23. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

24. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

25. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

26. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

27. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

28. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

29. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

30. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

31. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

32. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

33. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

34. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

35. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

36. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

37. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

38. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

39. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

40. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

41. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

42. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

43. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated on the schedule of disposal of records.

DATE RECEIVED NOV 27 1953		JUN NO. NNA-3152	
DATE APPROVED 12/1/53		DATE 1-18-60	
HOUSE REPORT NO. 2203		CONGRESSIONAL AUTHORIZATION 22	
NOTIFICATION TO AGENCY 11/9/60		CONGRESS HAS AUTHORIZED DISPOSAL OF ITEMS MARKED "DISPOSAL APPROVED" IN COLUMN 18, OF BUDGETARY STATEMENTS IN THE FISCAL YEAR 1960	
11/9/60		Shall	
(Date)		Archivist's Representative	

11/9/59 D. F. Williams Director, Bureau of Management Services

7. ITEM NO.	8. DESCRIPTION OF ITEM	9. SAMPLE OR COPY NO.	10. ACTION TAKEN
1.	Central Office Investigation Case Files: Reports on applicants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veterans' Preference Act of 1944 and under the security clearance program. The case files include the following: some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suitability and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive qualification cases, and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except MACIs for nonsensitive positions where no derogatory information is found, which are disposed after 3 months). Cases contain papers giving the story of each investigation from original request or appeal to final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Appeals and Review, the Loyalty Review Board, and the Commission, are included.		DISPOSAL APPROVED
	Destroy 30 years from date of last action. Transfer to Federal Records Center 5 years after date of last action. Destroy 25 years later		
	NOTE: Due to the confidential nature of these papers, samples are not submitted but are available for inspection in Room 354, Civil Service Commission, 8th and F Streets, N. W.		

Four copies, including original, to be submitted to the National Archives and Records Service

APPRAISAL REPORT

Disposal Job No. II-WNA-3152

Approved:

Item 1, because these records have no appreciable value for historical or other research uses, and the Civil Service Commission has determined that neither it nor other agencies need them for administrative purposes for more than 30 years after the date of last action in a case. These investigation case files contain an overwhelming amount of minutiae on the fitness of about 2,000,000 persons for Federal employment.

There would be little possible research use to which they might be put which could not be met by other records which are being preserved. Official personnel folders, which have a long retention period, document the acceptance of an individual for Federal employment after investigation. The Federal Bureau of Investigation presently is retaining a copy of its report when it makes a full field investigation for the Commission in one of these cases.

Any policy matter relating to the Commission's investigation program that might be reflected in some of these case papers would be documented in correspondence files of the head of the Investigations Division or of the Civil Service Commission. The Commission also is retaining a master card index to its security investigations. This index covers all individuals, about 6,000,000 of them, investigated by the Civil Service Commission and other agencies since 1939, and some prior to 1939. The index serves also as a record, since each card contains for the individual named the date of the case, results of national agency checks, other data on the case, and such identifying information as social security number and date and place of birth. The Commission also is preserving narrative and statistical reports on its investigation program.

These other records of the Civil Service Commission that are being preserved contain sufficient information on the Commission's activities and functions in investigations concerning merit, suitability, and loyalty. The case files for which disposal authority is requested, therefore, need not be preserved permanently in order to document these activities and functions.

Appraised by: Hardee Allen Dec. 15, 1959
 BH. Hardee Allen

Approved for the Archivist: Thad Page 12/17/59
 Thad S. Page
 Chief Archivist
 General Records Division

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
PAGE 3 (4-7-52)

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

61 A - 200

RECORD GROUP NO.

146

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

U. S. Civil Service Commission
8th & F Sts., N. W.
Washington 25, D. C.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

David F. Williams

TITLE

Director, Bureau of
Management Services

DATE

November 15, 1960

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

USCSC Investigations Division Code 129
Mr. Pearley O. Buck 4th & F Sts., N. W. Room 133P Ext. 3989

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Official CCID Reports of Investigations and all related case papers (as described in GSA AMS 178-C, October, 1960, "Investigations" Item 1a) composed of the following sub-series:

1. Main Alphabetical File. 1928 thru 6/30/59. Cases reopened subsequent to this date are withdrawn and incorporated into the current case files. Master Index located in U. S. Investigations Division.
2. Service Alphabetical Files. 1928 thru 6/30/59. Same as above and cross-referenced in 1 above.
3. Special File (fraud, collusion, embezzlement). Filed by state and city. 1918 thru 6/30/59. Names cross referenced in Master Index.

6. RESTRICTIONS ON USE OF RECORDS (If no restriction, write "none")

See attached agreement

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) II-NMA-3152 Trans to
☐ NO FSC after 5 yrs. Destroy 25 yrs later.

8. CUBIC FEET OF RECORDS TRANSFERRED

19.985

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

None

10. SQUARE FEET OF SPACE RELEASED

Office
17,070

Storage

LOCATION

Temporary Bldg. D, 4th & Independence Ave., S.W.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
REMOVED AND RETAINED AT AGENCY					
REMOVED AND SHIPPED IN	1,250			4,200	
TO BE RETURNED	321				
CUBIC FEET OF SHELVEING EMPLOYED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

LOCATION IN FEDERAL RECORDS CENTER

THE ABOVE DESCRIBED RECORDS WERE RECEIVED
SPOILAGES, DAMAGED CONTAINERS, ETC.

11/2 - 1960

Building ALEX, Room 81

Albert Whimpy Floor 4D-44/- Sec. 48-125/5 Row
Chief, Acquisition & Disposal Section

Federal Records Administration, GSA
Bldg. 1, Alexandria, Virginia

SIGNATURE

TITLE

61 A - 200

U. S. GOVERNMENT PRINTING OFFICE 16-60463-1

4. Loyalty Files (119-2) Alphabetical by name of individual. 1917 thru 1941.
5. Bar and Flag Cases, 103-1 thru 103-15725. 1915 thru 1941. Index located in the Central Files Unit of the Central Office. Numerical gaps represent cases carried forward to the Main Alphabetical File.

United States Senate
Office of the Majority Leader
Washington, D.C. 20510

February 7, 1975

NRCS
2/11
OFFICE
R. Young
R. C. Smith
REC. DIST. E.
REPLY BOX:

Honorable Arthur F. Sampson
Administrator
General Services Administration
Washington, D. C. 20405

Dear Mr. Sampson:

As you may be aware, the Senate is to conduct an investigation and study of government operations with respect to intelligence activities. The scope of the investigation is set out in S. Res. 21, a copy of which has been enclosed for your information.

We are writing to request that you not destroy, remove from your possession or control, or otherwise dispose or permit the disposal of any records or documents which might have a bearing on the subjects under investigation, including but not limited to all records or documents pertaining in any way to the matters set out in section 2 of S. Res. 21.

Additionally, we shall appreciate your cooperation in requesting the National Archives and Records Service to be alert to the provisions of the Resolution and not destroy records to which it applies, regardless of their age or the agency from which the destruction request is received.

Sincerely yours,

Hugh Scott
HUGH SCOTT, REPUBLICAN LEADER

Mike Mansfield
MIKE MANSFIELD, MAJORITY LEADER

Enclosure

REC'D
FEB 12 1 23 PM '75
MAIL ROOM

94TH CONGRESS
1ST SESSION

S. RES. 21

IN THE SENATE OF THE UNITED STATES

JANUARY 21, 1975

Mr. PASTORE submitted the following resolution; which was ordered to be placed on the calendar (under general orders)

JANUARY 27, 1975

Considered, amended, and agreed to

RESOLUTION

To establish a select committee of the Senate to conduct an investigation and study with respect to intelligence activities carried out by or on behalf of the Federal Government.

- 1 *Resolved*, To establish a select committee of the Senate
2 to conduct an investigation and study of governmental op-
3 erations ~~with~~ respect to intelligence activities and of the
4 extent, if any, to which illegal, improper, or unethical activ-
5 ities were engaged in by any agency of the Federal Govern-
6 ment or by any persons, acting individually or in combination
7 with others, with respect to any intelligence activity carried
8 out by or on behalf of the Federal Government; be it further
9 *Resolved*, That (a) there is hereby established a select
10 committee of the Senate which may be called, for con-

V—O

1 venience of expression, the Select Committee To Study
2 Governmental Operations With Respect to Intelligence Ac-
3 tivities to conduct an investigation and study of the extent, if
4 any, to which illegal, improper, or unethical activities were
5 engaged in by any agency or by any persons, acting either
6 individually or in combination with others, in carrying out
7 any intelligence or surveillance activities by or on behalf
8 of any agency of the Federal Government.

9 (b) The select committee created by this resolution
10 shall consist of eleven Members of the Senate, six to be
11 appointed by the President of the Senate from the majority
12 Members of the Senate upon the recommendation of the
13 majority leader of the Senate, and five minority Members of
14 the Senate to be appointed by the President of the Senate
15 upon the recommendation of the minority leader of the
16 Senate. For the purposes of paragraph 6 of rule XXV of the
17 Standing Rules of the Senate, service of a Senator as a
18 member, chairman, or vice chairman of the select committee
19 shall not be taken into account.

20 (c) The majority members of the committee shall select
21 a chairman and the minority members shall select a vice
22 chairman and the committee shall adopt rules and procedures
23 to govern its proceedings. The vice chairman shall preside
24 over meetings of the select committee during the absence
25 of the chairman, and discharge such other responsibilities

1 as may be assigned to him by the select committee or the
2 chairman. Vacancies in the membership of the select com-
3 mittee shall not affect the authority of the remaining mem-
4 bers to execute the functions of the select committee and
5 shall be filled in the same manner as original appointments
6 to it are made.

7 (d) A majority of the members of the select committee
8 shall constitute a quorum for the transaction of business, but
9 the select committee may affix a lesser number as a quorum
10 for the purpose of taking testimony or depositions.

11 SEC. 2. The select committee is authorized and directed
12 to do everything necessary or appropriate to make the in-
13 vestigations and study specified in subsection (a) of the
14 first section. Without abridging in any way the authority
15 conferred upon the select committee by the preceding
16 sentence, the Senate further expressly authorizes and directs
17 the select committee to make a complete investigation and
18 study of the activities of any agency or of any and all persons
19 or groups of persons or organizations of any kind which
20 have any tendency to reveal the full facts with respect to
21 the following matters or questions:

22 (1) Whether the Central Intelligence Agency has
23 conducted an illegal domestic intelligence operation in
24 the United States.

1 (2) The conduct of domestic intelligence or coun-
2 terintelligence operations against United States citizens
3 by the Federal Bureau of Investigation or any other
4 Federal agency.

5 (3) The origin and disposition of the so-called Hus-
6 ton Plan to apply United States intelligence agency
7 capabilities against individuals or organizations within
8 the United States.

9 (4) The extent to which the Federal Bureau of In-
10 vestigation, the Central Intelligence Agency, and other
11 Federal law enforcement or intelligence agencies coordi-
12 nate their respective activities, any agreements which
13 govern that coordination, and the extent to which a lack
14 of coordination has contributed to activities or actions
15 which are illegal, improper, inefficient, unethical, or con-
16 trary to the intent of Congress.

17 (5) The extent to which the operation of domestic
18 intelligence or counterintelligence activities and the
19 operation of any other activities within the United States
20 by the Central Intelligence Agency conforms to the leg-
21 islative charter of that Agency and the intent of the
22 Congress.

23 (6) The past and present interpretation by the
24 Director of Central Intelligence of the responsibility to
25 protect intelligence sources and methods as it relates to

1 the provision in section 102 (d) (3) of the National
2 Security Act of 1947 (50 U.S.C. 403 (d) (3)) that
3 "... that the agency shall have no police, subpena, law
4 enforcement powers, or internal security functions. . . ."

5 (7) Nature and extent of executive branch over-
6 sight of all United States intelligence activities.

7 (8) The need for specific legislative authority to
8 govern the operations of any intelligence agencies of
9 the Federal Government now existing without that
10 explicit statutory authority, including but not limited to
11 agencies such as the Defense Intelligence Agency and
12 the National Security Agency.

13 The nature and extent to which Federal agencies
14 cooperate and exchange intelligence information and
15 the adequacy of any regulations or statutes which
16 govern such cooperation and exchange of intelligence
17 information.

18 (9) The extent to which United States intelligence
19 agencies are governed by Executive orders, rules, or
20 regulations either published or secret and the extent
21 to which those Executive orders, rules, or regulations
22 interpret, expand, or are in conflict with specific legis-
23 lative authority.

24 (10) The violation or suspected violation of any
25 State or Federal statute by any intelligence agency or

1 by any person by or on behalf of any intelligence agency
2 of the Federal Government including but not limited
3 to surreptitious entries, surveillance, wiretaps, or eaves-
4 dropping, illegal opening of the United States mail, or
5 the monitoring of the United States mail.

6 (11) The need for improved, strengthened, or con-
7 solidated oversight of United States intelligence ac-
8 tivities by the Congress.

9 (12) Whether any of the existing laws of the
10 United States are inadequate, either in their provisions
11 or manner of enforcement, to safeguard the rights of
12 American citizens, to improve executive and legislative
13 control of intelligence and related activities, and to re-
14 solve uncertainties as to the authority of United States
15 intelligence and related agencies.

16 (13) Whether there is unnecessary duplication of
17 expenditure and effort in the collection and processing
18 of intelligence information by United States agencies.

19 (14) The extent and necessity of overt and covert
20 intelligence activities in the United States and abroad.

21 (15) Such other related matters as the committee
22 deems necessary in order to carry out its responsibilities
23 under section (a).

24 SEC. 3. (a) To enable the select committee to make
25 the investigation and study authorized and directed by this

1 resolution, the Senate hereby empowers the select committee
2 as an agency of the Senate (1) to employ and fix the com-
3 pensation of such clerical, investigatory, legal, technical,
4 and other assistants as it deems necessary or appropriate,
5 but it may not exceed the normal Senate salary schedules;
6 (2) to sit and act at any time or place during sessions,
7 recesses, and adjournment periods of the Senate; (3) to hold
8 hearings for taking testimony on oath or to receive docu-
9 mentary or physical evidence relating to the matters and
10 questions it is authorized to investigate or study; (4) to
11 require by subpoena or otherwise the attendance as witnesses
12 of any persons who the select committee believes have
13 knowledge or information concerning any of the matters
14 or questions it is authorized to investigate and study; (5)
15 to require by subpoena or order any department, agency,
16 officer, or employee of the executive branch of the United
17 States Government, or any private person, firm, or corpora-
18 tion, to produce for its consideration or for use as evidence
19 in its investigation and study any books, checks, canceled
20 checks, correspondence, communications, document, papers,
21 physical evidence, records, recordings, tapes, or materials re-
22 lating to any of the matters or questions it is authorized to
23 investigate and study which they or any of them may have
24 in their custody or under their control; (6) to make to the
25 Senate any recommendations it deems appropriate in respect

1 to the willful failure or refusal of any person to answer ques-
2 tions or give testimony in his character as a witness during
3 his appearance before it or in respect to the willful failure
4 or refusal of any officer or employee of the executive branch
5 of the United States Government or any person, firm, or
6 corporation to produce before the committee any books,
7 checks, canceled checks, correspondence, communications,
8 document, financial records, papers, physical evidence,
9 records, recordings, tapes, or materials in obedience to any
10 subpoena or order; (7) to take depositions and other testi-
11 mony on oath anywhere within the United States or in any
12 other country; (8) to procure the temporary or intermit-
13 tent services of individual consultants, or organizations there-
14 of, in the same manner and under the same conditions as
15 a standing committee of the Senate may procure such serv-
16 ices under section 202 (i) of the Legislative Reorganiza-
17 tion Act of 1946; (9) to use on a reimbursable basis, with
18 the prior consent of the Committee on Rules and Adminis-
19 tration, the services of personnel of any such department
20 or agency; (10) to use on a reimbursable basis or other-
21 wise with the prior consent of the chairman of any sub-
22 committee of any committee of the Senate the facilities or
23 services of any members of the staffs of such other Senate
24 committees or any subcommittees of such other Senate com-
25 mittees whenever the select committee or its chairman deems

1 that such action is necessary or appropriate to enable the
2 select committee to make the investigation and study author-
3 ized and directed by this resolution; (11) to have direct
4 access through the agency of any members of the select
5 committee or any of its investigatory or legal assistants
6 designated by it or its chairman or the ranking minority
7 member to any data, evidence, information, report, analysis,
8 or document or papers, relating to any of the matters or
9 questions which it is authorized and directed to investigate
10 and study in the custody or under the control of any depart-
11 ment, agency, officer, or employee of the executive branch
12 of the United States Government, including any department,
13 agency, officer, or employee of the United States Govern-
14 ment having the power under the laws of the United States
15 to investigate any alleged criminal activities or to prosecute
16 persons charged with crimes against the United States and
17 any department, agency, officer, or employee of the United
18 States Government having the authority to conduct intelli-
19 gence or surveillance within or outside the United States,
20 without regard to the jurisdiction or authority of any other
21 Senate committee, which will aid the select committee to
22 prepare for or conduct the investigation and study authorized
23 and directed by this resolution: and (12) to expend to the
24 extent it determines necessary or appropriate any moneys

1 made available to it by the Senate to perform the duties
2 and exercise the powers conferred upon it by this resolution
3 and to make the investigation and study it is authorized by
4 this resolution to make.

5 (b) Subpenas may be issued by the select committee
6 acting through the chairman or any other member designated
7 by him, and may be served by any person designated by
8 such chairman or other member anywhere within the borders
9 of the United States. The chairman of the select committee,
10 or any other member thereof, is hereby authorized to admin-
11 ister oaths to any witnesses appearing before the committee.

12 (c) In preparing for or conducting the investigation
13 and study authorized and directed by this resolution, the
14 select committee shall be empowered to exercise the powers
15 conferred upon committees of the Senate by section 6002 of
16 title 18, United States Code, or any other Act of Congress
17 regulating the granting of immunity to witnesses.

18 SEC. 4. The select committee shall have authority to
19 recommend the enactment of any new legislation or the
20 amendment of any existing statute which it considers neces-
21 sary or desirable to strengthen or clarify the national secu-
22 rity, intelligence, or surveillance activities of the United
23 States and to protect the rights of United States citizens
24 with regard to those activities.

1 SEC. 5. The select committee shall make a final report
2 of the results of the investigation and study conducted by
3 it pursuant to this resolution, together with its findings and
4 its recommendations as to new congressional legislation it
5 deems necessary or desirable, to the Senate at the earliest
6 practicable date, but no later than September 1, 1975. The
7 select committee may also submit to the Senate such interim
8 reports as it considers appropriate. After submission of its
9 final report, the select committee shall have three calendar
10 months to close its affairs, and on the expiration of such
11 three calendar months shall cease to exist.

12 SEC. 6. The expenses of the select committee through
13 September 1, 1975, under this resolution shall not exceed
14 \$750,000 of which amount not to exceed \$100,000 shall be
15 available for the procurement of the services of individual
16 consultants or organizations thereof. Such expenses shall be
17 paid from the contingent fund of the Senate upon vouchers
18 approved by the chairman of the select committee.

19 SEC. 7. The select committee shall institute and carry
20 out such rules and procedures as it may deem necessary to
21 prevent (1) the disclosure, outside the select committee, of
22 any information relating to the activities of the Central In-
23 telligence Agency or any other department or agency of the
24 Federal Government engaged in intelligence activities, ob-

1 tained by the select committee during the course of its study
2 and investigation, not authorized by the select committee
3 to be disclosed; and (2) the disclosure, outside the select
4 committee, of any information which would adversely affect
5 the intelligence activities of the Central Intelligence Agency
6 in foreign countries or the intelligence activities in foreign
7 countries of any other department or agency of the Federal
8 Government.

9 SEC. 8. As a condition for employment as described in
10 section 3 of this resolution, each person shall agree not to
11 accept any honorarium, royalty or other payment for a
12 speaking engagement, magazine article, book, or other en-
13 deavor connected with the investigation and study under-
14 taken by this committee.

15 SEC. 9. No employee of the select committee or any
16 person engaged by contract or otherwise to perform services
17 for the select committee shall be given access to any classi-
18 fied information by the select committee unless such em-
19 ployee or person has received an appropriate security clear-
20 ance as determined by the select committee. The type of
21 security clearance to be required in the case of any such
22 employee or person shall, within the determination of the
23 select committee, be commensurate with the sensitivity of
24 the classified information to which such employee or person
25 will be given access by the select committee.

**REQUEST FOR AUTHORITY
TO DISPOSE OF RECORDS**
(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)

U. S. Civil Service Commission

2. MAJOR SUBDIVISION

Bureau of Management Services

3. MINOR SUBDIVISION

Records Administration Section

4. NAME OF PERSON WITH WHOM TO CONFER

Charles R. Chesek

5. TEL. EXT.

632-4510

6. CERTIFICATE OF AGENCY REPRESENTATIVE

LEAVE BLANK

DATE RECEIVED

JUL 16 1975

JOB NO.

NC-146-76-1

NOTIFICATION TO AGENCY

In accordance with the provisions of 44 U.S.C. 2351a the disposal request, including amendments, is approved except for items that may be changed "disposal not approved" or "withdrawn" in column 1B.

7-22-75

(Date)

James E. O'Hall
Archivist of the United States

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of Disposal are not now needed for the business of this agency or will not be needed after the retention periods specified.

7/16/75
Date
Eugene D. Kummel
Signature of Agency Representative

Chief, Office Services Division

(Title)

7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
1.	<u>Investigative Case Files</u> Break closed cases annually. Transfer to FARC 5 years after break. Destroy 15 years after transfer.	II-NMA-3152	
2.	<u>Security Investigations Index</u> When an investigative case file is not maintained, destroy 2 years from the date of the last action. Destroy all other cards 20 years after date of last action.	II-NMA-3152	

115-106

STANDARD FORM 115
Revised January 1973
Prescribed by General Services
Administration
FPMR (41 CFR) 101-11.6

APPRAISAL REPORT
 Disposal Job No. NC-146-76-1

Approved for Disposal:

The items for which disposal is requested are disposable because they do not have sufficient value for purposes of historical or other research, functional documentation, or the protection of individual rights to warrant permanent retention by the Federal Government.

Appraiser:

Carmelita S. Ryan
 CARMELITA S. RYAN

7/17/75
 Date

Approval Recommended:

Thomas W. Wadlow
 THOMAS W. WADLOW
 Director
 Records Disposition Division

7/17/75
 Date

Approval Recommended:

Meyer H. Fishbein
 MEYER H. FISHBEIN
 Director
 Records Appraisal Staff

7/17/75
 Date

July 25, 1975

Mr. Donald J. Biglin, Director
Bureau of Management Services
U.S. Civil Service Commission
Washington, DC 20415

Dear Mr. Biglin:

The enclosed Standard Form 115, (Job Number NC-146-76-1), covering records of your agency has been approved by the Archivist of the United States.

As you are no doubt aware, this is the culmination of many months of hard work on the part of Mr. Charles E. Chesebrough and Mr. Eugene D. Rummel who have been working with us to secure a shorter retention period for personnel security clearance case files. The reduction of ten years in the length of time that such records must be kept will permit the disposition of a sizable volume of your agency's investigative case files that are now stored in the Washington National Records Center.

We have been advised by the Congress, however, that under the provisions of Senate Resolution 21 records of this nature are not to be destroyed at this time. You should note carefully the final paragraph of the attached information copy of the notification. We will retain these records in our custody until this investigation is completed.

We appreciate your assistance and that of your staff in reducing the retention period for these records. The reduction in space requirements will result in substantial savings for the Federal Government.

Sincerely,

Walter W. Stender

WALTER W. STENDER
Assistant Archivist for
Federal Records Centers

Enclosures

OFFICIAL FILE:NC
DAY FILE:NC

CRYAN:od:7/25/75
GSP

United States Senate
Office of the Majority Leader
Washington, D.C. 20510

February 7, 1975

NRPS
off 10
A. Young
A. H. [unclear]
Rec. Dist. E
REPLY DUE:

Honorable Arthur F. Sampson
Administrator
General Services Administration
Washington, D. C. 20405

Dear Mr. Sampson:

As you may be aware, the Senate is to conduct an investigation and study of government operations with respect to intelligence activities. The scope of the investigation is set out in S. Res. 21, a copy of which has been enclosed for your information.

We are writing to request that you not destroy, remove from your possession or control, or otherwise dispose or permit the disposal of any records or documents which might have a bearing on the subjects under investigation, including but not limited to all records or documents pertaining in any way to the matters set out in section 2 of S. Res. 21.

Additionally, we shall appreciate your cooperation in requesting the National Archives and Records Service to be alert to the provisions of the Resolution and not destroy records to which it applies, regardless of their age or the agency from which the destruction request is received.

Sincerely yours,

Hugh Scott
HUGH SCOTT, REPUBLICAN LEADER

Mike Mansfield
MIKE MANSFIELD, MAJORITY LEADER

Enclosure

REC'D
FEB 12 1 23 PM '75
MAIL ROOM

GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington, DC 20408



DATE: July 16, 1975

REPLY TO
ATTN OF: WCD

SUBJECT: NC-146-76-1

The Civil Service Commission in response to a request from the Records Disposition Division (copies of correspondence attached) has proposed to reduce the retention period on their investigative case files from 30 years to 25 years.

At the same time, CSC reevaluated their security investigations index which had been previously listed as a disposal not authorized item and decided to keep the index to the investigations case files only as long as they kept the case files - 20 years. When no investigation case file was prepared the index entry will be kept only 2 years after the date of the last action.

Since these records are primarily of administrative value to the agency I recommend that they should be destroyed at the times indicated.

In view of the fact that this disposal job proposes a reduction in the retention period of records already appraised as of temporary value (disposal job II-NNA-3152) it is not necessary to send the job to the custodial unit for examination.

Carmelita S. Ryan

CARMELITTA S. RYAN
Records Disposition Division



Keep Freedom in Your Future With U.S. Savings Bonds

TR 5

3. INV. 01

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
	INVESTIGATIONS This functional grouping of records consists of collections of reports, indexes, case files, etc., relating to the administration and appraisal of the Government-wide investigative and suitability-rating programs; reports of Loyalty Review Board or Security Hearing Boards; training of investigators, etc. SEE: LEG for Hatch Act cases; COM for management of Boards. Investigative case files: Includes investigative reports and all related case records. (a) Record copies of reports and related papers. Files retained in BPI. (b) Copies of reports, related papers, and investigator notes retained in RID. (1) copies of region of origin cases (2) copies of participating region cases (i.e. cases originated in other regions or BPI). (3) copies of spot checks, personal confidential inquiries, and personal record searches.	Temporary Nonrecord Nonrecord Nonrecord	Transfer to Federal Records Center 5 years after date of closing action. Destroy 25 years after transfer (except those designated by Archives for permanent retention). Destroy 6 months after case is closed. See FPM Supp. (Int.) 736-72 for detailed disposition instructions. Destroy 6 months after case is closed. Destroy 6 months after case is closed.

3. INV. 02

TR 5

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
	Item 1 (b) cont'd.		
	(4) copies of postmaster, rural carrier, political activity, and other special types of investigative cases.	Nonrecord	Destroy 6 months after case is closed.
	(c) Bar and flag files, excluding medical flags.		
	* (1) copies of closed cases resulting in debarment or flagging.	Temporary	Transfer to Federal Records Center 5 years after date of closing action. Destroy 25 years after date of transfer.
* 2	(2) regional office copy of closed cases which resulted in debarment or flagging.	*Nonrecord*	Destroy 6 months after case is closed.
	(DELETED)		
2A	Security Investigations Index: Central office index to personnel investigations made by the CSC. (Includes records of personnel investigations made by agencies since 1939, records of CSC bar and flag action investigations and material formerly identified as the central office Master Index.)	Permanent	Disposal not authorized. Retain for reference use.
2B	Investigations Locator File: Card index to pending and recently closed investigations maintained in RID and WDI.	Nonrecord	Break semiannually beginning July 1, 1964. Destroy 6 months after break.
3	Case Control File: Card record maintained by deadline date, in RID and WDI.	Temporary	Destroy when case is closed, unless card is filed in SII per FPA Supp. (Int.) 736-72.

September 1964

AM Supplement 173-D

UNITED STATES CIVIL SERVICE COMMISSION

WASHINGTON, D.C. 20415

9 DEC 1974

Mr. Thomas W. Wadlow
 Director, Records Disposition Division
 National Archives and Records Service
 General Services Administration
 Washington, D.C. 20408

Dear Mr. Wadlow:

With reference to your letter of August 29, 1974, to Mr. Robert J. Drummond, Jr., Director, Bureau of Personnel Investigations, we have given careful consideration to your proposal to reduce the retention period for our investigative case files from 30 years to 15 years for "non-derogatory" and 30 years for "derogatory", however, as you know, our investigative case files do not carry any markings as to whether the case is or is not derogatory. To separate the case files stored at the Federal Records Center (FRC) into "non-derogatory" and "derogatory" categories would not be a simple task. Each case file would have to be reviewed to place it into the proper category requiring the expenditure of more resources than would likely justify the results gained.

Therefore, as an alternative to the 15/30 year destruction schedule, we propose reducing the retention schedule from the present 30 years for all investigative case files to 20 years for all files. This should eventually eliminate more files than the 15/30 year schedule and could be accomplished without reviewing the files. Our alphabetical files which date from 1928-1959 and comprise approximately 19,000 cubic feet, could all be destroyed in 1980.

Since 1959 we have used a numerical filing system which lends itself more easily to a simple destruction schedule. Using the 20 year retention period, we estimate that approximately 75,000 files could be destroyed each year after 1980.

If you agree with this proposal, we will obtain the necessary Commission approval to reduce the retention period of the records in question from 30 years to 20 years. If approval is granted,

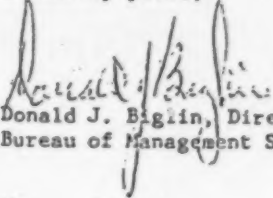


1883-1973

MERIT PRINCIPLES ASSURE QUALITY AND EQUAL OPPORTUNITY

you may wish to screen our alphabetical files to purge those cases that are older than 20 years thus effecting a space reduction in the FRC before 1980.

Sincerely yours,


Donald J. Biglin, Director
Bureau of Management Services

August 29, 1974

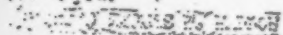
Mr. Robert J. Drummond, Jr.
Director, Bureau of Personnel Investigation
Room 333
1717 H Street, NW
Washington, DC

Dear Mr. Drummond:

We are considering a reduction in the retention period of cleared "non-derogatory", or "favorable", personnel security clearance case files. Presently, non-derogatory and derogatory cases alike are held a full thirty years after date of the last action per item 23 of General Records Schedule 18 "Security and Protective Services Records" approved August 10, 1960. The Department of Defense, however, has since seen fit to reduce the retention period on their favorable cases to 15 years. An example of DOD reasoning in this matter is attached, as Enclosure 1.

In compliance with 101-11.404-2 of the Federal Property Management Regulations we must have the concurrence of a representative of the USCSC to record this item, and have provided a place on the attached SF 115, "Request for Authority to Dispose of Records", for USCSC concurrence. In this regard we have consulted with Mr. Charles Chacek, Chief, Records Administration Section, United States Civil Service Commission. He indicated his general agreement with the reduction in retention period, and recommended that we obtain your concurrence in the attached amendment to General Records Schedule 18. Please sign the original and two copies and return to us. If approved this amendment will result in disposal of an estimated 20,000 cubic feet of records at the Washington National Records Center.

If you have questions please contact Mr. Chacek, who will receive a copy of this letter. If you approve this request, consideration should be given to filing security clearance case files in a manner which will facilitate separating derogatory from non-derogatory cases at time of transfer to the record center, as "favorable" or "derogatory" case files will continue to be retained 30 years.

Very truly,


THOMAS W. VAILLOW
Acting Director
Records Disposition Division

Enclosure

OFFICIAL FILE:HC
DAY FILE:HC
Mr. Chacek

UCP:HC:plm:8/29/74

United States Civil Service Commission

Administrative Manual System☐ Manual Installment☒ Supplement Installment

Disposition of Records

AM Inst. 1

AM Supplement 44-3

Washington, D. C. 20415

November 14, 1977

TABLE OF CHANGES

REMOVE		INSERT	EXPLANATION OF CHANGES
PAGE	IDENTIFICATION	PAGE	
Old cover (AM Supplement 178-D)		New Cover	Changes number of manual in line with new Administrative Manual structure.
Entire Part III	various transmittals	Entire Part III	Updates and revises Part III. Revised index will follow at a later date.

44-3

Previously Issued as AM Supplement 178-D

CSC **Administrative** **Manual** Supplement

Disposition of Records



United States
Civil Service Commission

PART III

CSC RECORDS SCHEDULES

The CSC Records Schedules contain the disposition instructions to be applied to specific series of records. To facilitate the application of these schedules in an orderly and systematic manner, records should be

- a. separated and maintained in record and non-record categories,
- b. "broken" periodically, and
- c. filed in accordance with the standards set forth in AM Supplement 178-C.

To aid in locating specific schedules, Part III of this Supplement has been assembled as follows:

- a. Functional Checklist - The checklist relates the functional classification to the three letter code used to index the individual pages (i.e., ADM - Administrative Management; APP - Appeals).
- b. Index - The alphabetical index refers the user to the functional category in which a series of records may be found.
- c. Records Schedules - These schedules describe the records in detail and give the disposition instructions applicable to each individual record series.

Section .01

FUNCTIONAL CHECKLIST OF CSC RECORDS SCHEDULES

ADMINISTRATIVE (HOUSEKEEPING) RECORDS

(Collections which are common to all organizational units)

ADM	ADMINISTRATIVE MANAGEMENT
ADS	ADMINISTRATIVE SERVICES
BUF	BUDGET AND FISCAL
COM	COMMITTEE MANAGEMENT
INF	INFORMATION SERVICES
PER	PERSONNEL (CSC)

SUBSTANTIVE (PROGRAM) RECORDS

(Specialized Program and Operating Records)

APP	APPEALS
CLC	CLASSIFICATION AND COMPENSATION
EDU	EMPLOYEE DEVELOPMENT AND UTILIZATION
ERS	EMPLOYEE RELATIONS AND SERVICES
EMP	EMPLOYMENT
EVL	EVALUATIONS
EXR	EXAMINING AND RECRUITMENT
IHS	INSURANCE
INV	INVESTIGATIONS
IPP	INTERGOVERNMENTAL PERSONNEL PROGRAMS
LEG	LEGAL
MED	MEDICAL
RET	RETIREMENT
SPC	SPECIAL CATEGORIES

NOTE: For convenience of use, the schedules included in Section 3 of this Supplement are arranged in alphabetical order, regardless of their basic functional coverage -- either administrative or substantive.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	ADMINISTRATIVE MANAGEMENT This grouping of records consists of documents relating to internal housekeeping operations covering overall policy, mission, organization and direction of the Commission including management improvement programs and documents relating to all formal rules, regulations and guides, as distinguished from records concerning specific Government-wide programs of an individual activity. 1. Organizational and Functional Files; consisting of charts, delegations of authority and special reports and studies that document the origin, administrative development and past and present organizational structure of the Commission. 2. General Correspondence Files (and related documentation). a. Central Office Policy and Procedure File; consisting of correspondence relating to the establishment of substantive Commission policies and procedures classified under a subject-numeric system and maintained in the Records Service Unit in the central office. b. Other Policy and Procedure Files; consisting of policy and procedure correspondence at bureau and staff office level maintained outside the Records Service Unit. c. Routine correspondence containing clarification or interpretation of general policies, procedures, rules, regulations and instructions. 3. Regional Office Subject Reference File, maintained in the Records Service Unit, consisting of the record set and index to all instructions from central to regional offices. 4. Agendas, minutes, summaries and reports of the Regional Directors' Conference and similar meetings or conference. a. Files maintained by office of primary responsibility for organization and arrangement of meeting or conference. b. Files maintained by individual members or by other offices. 5. Invitations, attendance reports, agendas, minutes and reports of routine or ad hoc meetings of conferences such as panels, workshops and non-project working group concerning chiefly administrative matters. 6. Issuance File, maintained in the Records Service Unit, consisting of a single record copy of documents issued under the CSC issuance system. 7. Record copy of each internal directive issued by or for the Commissioners or the head of any bureau or staff office.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. PERMANENT. Break periodically. Offer to NARS when 20 years old. PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Break annually. Destroy 3 years after break. PERMANENT. Break periodically. Offer to NARS when 20 years old. PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Destroy when superseded or obsolete. Break annually. Destroy 3 years after break. PERMANENT. Offer to NARS periodically. PERMANENT. Offer to the NARS periodically.

3.ADM.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
8.	Management Audit Case Files. a. Final report. b. Papers relating to compilation and resolution of final report.	PERMANENT. Offer to NARS periodically. Destroy when 6 years old or upon issuance of succeeding report, whichever is earlier.
9.	Management projects. a. Record copy of each report, pamphlet, leaflet, graphic presentation or other published or processed document, and of the last manuscript report (if not processed or published) on substantive administrative and program management projects. b. Other administrative management reports covering routine evaluations and reports of general administrative operations along with selected background papers. Excluded from this group are documents under ADM 1 or ADM 8a. (1) Original reports in office receiving report. (2) Submitting office copies. c. Project working papers including source material, studies, analyses, notes, draft interim reports and related papers pertaining to project completion.	PERMANENT. Break annually. Offer to NARS when 20 years old. Break annually. Destroy 4 years after break. Break annually. Destroy 2 years after break or sooner if no longer needed for reference purposes. Destroy 6 months after final action on project report or 3 years after completion of report if no final action is taken.
10.	Project control documents showing assignment, progress and completion of projects.	Destroy 1 year after project completion.
11.	Annual Report. a. Record copy of each CSC Annual Report: b. Originals of bureau, regional and staff office submissions of Annual Report material. c. Copies of Annual Report submissions in originating offices. d. All other copies.	PERMANENT. Offer to NARS periodically. Destroy 5 years after release of annual report. Destroy 3 years after release of Annual Report. Destroy when no longer needed.
12.	Copies of management improvement reports to the Office of Management and Budget and selected background material. a. Bureau of Management Services copies. b. All other copies.	Break annually. Destroy 3 years after break or sooner if no longer needed for reference. Break annually. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
13.	Records Disposition Files, including descriptive inventories, disposal authorizations, schedules for retirement of records and correspondence relating to revisions.	Destroy when superseded or obsolete.
14.	Statistical reports of records holdings. a. Bureau of Management Services copies. b. All other copies.	Destroy when 2 years old. Destroy when 1 year old.
15.	Reports Control Files; consisting of case files maintained for each report created, cancelled or superseded.	Destroy 2 years after report is discontinued.
16.	Forms control records. a. Forms file. (1) Record copy of each form developed by the Commission. (2) Forms files other than those maintained in 16a. (1). b. CSC Form 80, or equivalent, Forms Control Record. (1) Forms kept by central office forms management staff. (2) Forms maintained by other CSC activities. c. OSD Form 33, or equivalent, Forms Record Card, consisting of cards of the central office Publications Section for all standard, optional, bureau, division and regional forms.	PERMANENT. Transfer to inactive file when superseded or obsolete. Start new file every 5 years. Transfer to FARC 5 years after file becomes inactive. Offer to NARS 15 years after file becomes inactive. Destroy when related forms are discontinued, superseded or cancelled. Transfer to inactive file when superseded or obsolete. Destroy 2 years after transfer. Transfer to inactive file when superseded or obsolete. Destroy 2 years after transfer. Transfer to inactive file when superseded or obsolete. Destroy 5 years after transfer.
17.	Reference collections; consisting of copies of manuals, books, pamphlets, booklets, reprints, correspondence, etc. used for reference purposes.	Maintain only references that are necessary to meet the operating needs of the activity and that are referred to frequently. Maximum use should be made of formally established reference collections such as the CSC library. Keep collections updated by frequently destroying material that is superseded, obsolete or otherwise no longer of value.

3.ADH.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	Stocks of supplies such as blank forms, reprints, booklets, pamphlets and other printed or processed documents.	Limit acquisition to reasonable and usable quantities. Maintain minimum supply necessary for operating requirement. Purge frequently all superseded, obsolete or otherwise unnecessary supplies.
19.	Working papers; consisting of papers on matters in progress e. g., studies, rough drafts, revisions, schedules, notes.	Unless otherwise indicated in this schedule, working papers should normally be destroyed once final action on the matter in progress is taken.
20.	Addressee-Index File. a. Central office Master Addressee-Index copies of central office correspondence, maintained in the Records Service Unit for cross-reference purposes. (1) Copies filed by agency, region, bureau or staff office. (2) Copies filed by name of school, state government, labor union or veterans organization. (3) All other copies filed. (4) Routine replies to requests for information or publications, acknowledgements, transmittals, referrals and similar correspondence. b. All other addressee-index, chronological or reading files.	Break annually. Destroy 10 years after break. Break every 2 years. Destroy 4 years after break. Break every 2 years. Destroy 2 years after break. Destroy without filing. Break annually. Destroy 1 year after break.
21.	Acknowledgements of inquiries and requests that have been referred outside the Commission for reply and letter of referral.	Break quarterly. Destroy 3 months from break or when no longer needed.
22.	Inventory of unanswered correspondence.	Break annually. Destroy 1 year from break.
23.	Indexes not covered elsewhere in this schedule.	Same as for the indexed material.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	ADMINISTRATIVE SERVICES	
	This grouping of records consists of documents relating to administrative services, such as procurement, space management and building maintenance, property management, communications and transportation, mail and distribution, printing, etc.	
1.	Contract, requisition, purchase order, lease, bond and surety records, including correspondence and related papers pertaining to award, organization copy, administration, receipt, inspection, and payment.	
	a. Transactions, after July 25, 1974, of more than \$10,000.	Break closed cases annually. Transfer to FARC 2 years after break. Destroy 6 years after break.
	b. Transactions, after July 25, 1974, of \$10,000 or less.	Break closed cases annually. Destroy 3 years after break.
	c. Obligation copy (See BUDGET AND FISCAL).	(BUDGET AND FISCAL).
	d. All other copies.	
	(1) Duplicates.	Break annually. Destroy 1 year after break.
	(2) Non-duplicates.	Destroy in accordance with 1a, b, c.
2.	Report by Civilian Executive Agencies on Procurement.	Destroy 2 years after date of report.
3.	Bid Files.	Destroy in accordance with the provisions of ADS item 1.
4.	Prospective bidder card record.	Destroy when evidence shows bidder is no longer interested in bidding.
5.	Vendor catalogues and Federal Supply Schedules.	Destroy as superseded.
6.	Register of purchase orders.	Break annually. Destroy 5 years after break.
7.	Requisitions for non-personal services, such as duplicating, laundry, binding and other services (excluding records associated with accountable officers' accounts).	Break annually. Destroy 1 year after break.
8.	Requisitions for supplies and equipment from current inventory.	
	a. Stockroom copy.	Break annually. Destroy 2 years after break.

3.ADS.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. All other copies.	Break semi-annually. Destroy 6 months after break.
9.	Inventory Files.	
	a. Inventory lists.	Destroy 2 years from date on list.
	b. Inventory cards.	Destroy 2 years after discontinuance of item or 2 years after stock balance is transferred to new card or recorded under a new classification, or 2 years after equipment is removed from agency control, whichever occurs first.
10.	Reports of supply requirements and procurement matters submitted for supply management purposes (other than those incorporated in case files or other files of a general nature).	
	a. Copies received from other units for internal purposes or for transmission to staff agencies.	Break annually. Destroy 2 years after break.
	b. Copies in other reporting units, and related work papers.	Break annually. Destroy 1 year after break.
11.	Reports of excess personal property.	Destroy 3 years after date of report.
12.	Annual report of non-expendable property.	Destroy 1 year after reconciliation with card record of inventory.
13.	Equipment maintenance record.	Destroy after annual summary of reports.
14.	Identification credentials and related papers.	
	a. Identification credentials including cards, badges, parking permits, photographs, agency permits to operate motor vehicles, and property and visitor's passes, etc.	Destroy immediately after return to issuing office.
	b. Receipts, indices, listings, and accountable records.	Destroy after all listed credentials are accounted for.
15.	Requests for building and equipment maintenance services, excluding fiscal copies	Break completed or cancelled requests quarterly. Destroy 3 months after break.
16.	Report on conservation of critical materials.	Destroy 2 years after date of report.
17.	Report on lost, damaged, destroyed or stolen property.	Destroy 2 years after date of survey action.
18.	Report on external transfer of excess property and disposal of surplus and proceeds thereof.	Destroy 3 years after date of report.
19.	Case files on sale of surplus personal property, comprising invitations, bids, acceptances, lists of materials, evidence of sales, and related correspondence.	

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	a. Transactions, after July 25, 1974, of more than \$10,000. b. Transactions, after July 25, 1974, of \$10,000 or less. c. Obligation copy (See BUDGET AND FISCAL). d. All other copies. (1) Duplicates. (2) Non-duplicates.	Break closed cases annually. Transfer to FARC 2 years after break. Destroy 6 years after break. Break closed cases annually. Destroy 3 years after break. (See BUDGET AND FISCAL). Break annually. Destroy 1 year after break. Break annually. Destroy in accordance with 20a, b, c.
20.	Inventory of Non-Expendable Property; certificate of compliance.	Destroy 2 years after date of report.
21.	Authorization for removal of property or materials, Property Pass Files.	Break expired or revoked pass files quarterly. Destroy 3 months after break.
22.	Records relating to the allocation, utilization and release of space under agency control, and related reports to GSA.	
	a. Building plan files and related agency records utilized in space planning, assignment and adjustment. b. Correspondence with and reports to staff agencies relating to agency space holdings and requirements. (1) Agency reports to GSA regarding space occupied in "Metropolitan Washington" and "Outside the District of Columbia," and related papers. (2) Copies in subordinate reporting units and related work papers.	Destroy 2 years after termination of assignment, or when lease is cancelled, or when plans are superseded or obsolete, whichever comes first. Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break.
23.	Correspondence, forms and other records relating to the compilation of directory service listings.	Destroy 2 months after issuance of listing.
24.	Regional office space reports.	Destroy 2 years after date of report.
25.	Files relating to accountability for personal property lost or stolen.	
	a. Ledger files.	Destroy 3 years after final entry.

3.ADS.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Reports, loss statements, receipts and other papers relating to lost and found articles.	Destroy 1 year from date of action.
26.	Files relating to accountability for keys issued.	For areas under maximum security, destroy 3 years after turn-in of key. For other areas, destroy 6 months after turn-in of key.
27.	Motor vehicles operating and maintenance records. a. Operating records. b. Maintenance records.	Break quarterly. Destroy 3 months after break. Break annually. Destroy 1 year after break.
28.	Motor vehicle ledger and work sheets providing cost and expense data.	Destroy 3 years after discontinuance of ledger or date of work sheet, whichever is sooner.
29.	Reports on motor vehicles (other than accident, operating, and maintenance reports).	Destroy 3 years after date of report.
30.	Records relating to motor vehicle accidents.	Break closed cases annually. Destroy 6 years after break.
31.	Vehicle Release Files.	Destroy 4 years after vehicle leaves agency custody.
32.	Records relating to individual employee operation of Government-owned vehicles, including driver tests, authorization to use, safe driving awards, and related correspondence.	Destroy 3 years after separation of employee or 3 years after rescission of authorization to operate Government-owned vehicle, whichever is earlier.
33.	Freight records consisting of export certificates, transit certificates, demurrage car record books, shipping documents pertinent to freight classification, memorandum copies of Government or commercial bills of lading, shortage and demurrage reports, and all supporting documents, including files relating to the shipment of household effects. a. Issuing office memorandum copies of freight transactions. b. All other copies. c. Bills of lading registers.	Break annually. Transfer to FARC after break, if volume warrants. Destroy 3 years after break. Break annually. Destroy 1 year after break. Destroy 3 years after final entry on register.
34.	Schedules of valuables shipped and related papers and reports.	Break annually. Destroy 3 years after break.
35.	Records relating to requisitions to the Public Printer and all supporting papers. a. Printing procurement unit copy of requisition, invoice, specifications and related papers.	Break completed or cancelled files annually. Destroy 4 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
36.	b. Accounting copy of requisition, GPO invoice, transfer of funds voucher, and receiving report. Job or project records containing all papers and data pertaining to the planning and execution of printing, binding, duplication and distribution jobs.	Break settled accounts annually. Destroy 4 years after break.
	a. Files pertaining to the accomplishment of the job, containing requisitions, bills, samples, manuscript clearances, and related papers exclusive of (1) requisitions on the Public Printer; and (2) records relating to services obtained outside the agency.	Break files on completed jobs annually. Destroy 2 years after break.
	b. Files pertaining to planning and other technical matters.	Break annually. Destroy 3 years after break.
37.	Control registers pertaining to requisitions and work orders for printing, binding, etc.	Destroy 1 year after close of fiscal year in which compiled, or 1 year after filling of request, whichever is applicable.
38.	Mailing lists and related material. a. Correspondence, request forms and other records relating to changes in mailing lists. b. Card lists.	Destroy after revision of mailing list or after 3 months, whichever is earlier. Destroy individual cards when cancelled or revised.
39	Report on printing machines and equipment, procured, disposed, or repaired. a. Office Services Division copy. b. Regional office copy.	Destroy 3 years after date of report. Destroy 1 year after date of report.
40.	Commercial Printing Report (JCP Form #2). a. Central office copy. b. All other copies.	Destroy 3 years after date of report. Destroy 1 year after date of report.
41.	Acquisition of Power-Operated Collators for Use in Facilities Other Than Printing Plants (JCP Form #3). a. Office Services Division copy. b. Regional office copy.	Destroy 3 years after date of report. Destroy 1 year after date of report.
42.	Printing reports to Congress and related records. a. Agency report to Joint Committee on Printing regarding operation of Class A and B plants and inventories of printing, binding, and related equipment in Class A and B or in storage.	Destroy 3 years from date of report.

3.ADS.06

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Copies in subordinate reporting units and related work papers.	Destroy 1 year after date of report.
43.	Stencils, plates, and mats used in reproduction including those used for duplicating test materials.	Destroy when superseded or obsolete.
44.	Mail control records including supporting and related papers.	
	a. Records of receipt and routing of incoming and outgoing mail other than (1) those listed in ADS item 49 and (2) records used as indexes to correspondence files.	Break annually. Destroy 1 year after break.
	b. Statistical reports of postage used on outgoing mail (airmail, special delivery, registered, foreign and parcel post over 4 pounds).	Break semi-annually. Destroy 6 months after break.
	c. Requisition for stamps (exclusive of copies used as supporting documents to payment vouchers).	Break semi-annually. Destroy 6 months after break.
	d. Production reports of mail handled and work performed, with compilations derived therefrom.	Break annually. Destroy 1 year after break.
	e. Records in agency mail units of remittances (check, cash, stamps, and money orders) and other valuable enclosures received through agency's mail unit in incoming mail.	Break annually. Destroy 1 year after break.
	f. Records of and receipts for mail and packages received through the Official Mail and Messenger Service.	Break semi-annually. Destroy 6 months after break.
45.	Inventory penalty material report.	Destroy 2 years after date of report.
46.	Messenger service records including daily logs, assignment records and instructions, dispatch record, delivery receipts, route schedules and related and similar records.	Break monthly. Destroy 2 months after break.
47.	Wire and wireless service control and operational records.	
	a. Machine copies of incoming and outgoing messages, message registers, operator's and equipment service logs, performance reports, daily load reports, and related papers.	Break semi-annually. Destroy 6 months after break.
	b. Teleautograph and telescribers tapes.	Destroy after message is dispatched
	c. Original copies of outgoing messages retained by wire and wireless service.	
	(1) Authorization copy not duplicated elsewhere showing time of dispatch.	Break annually. Destroy 2 years after break.
	(2) Authorization copy duplicated elsewhere showing time of dispatch.	Break semi-annually. Destroy 6 months after break.
48.	Postal records consisting of Postal Service forms and supporting papers.	
	a. Record of received or dispatched registered mail pouch.	Break annually. Destroy 1 year after break.
	b. Application for postal registration and certificate of declared value of matter subject to postal surcharge.	Break annually. Destroy 1 year after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	c. Receipt for incoming registered and insured mail.	Break annually. Destroy 1 year after break.
	d. Record of incoming and outgoing registered and insured mail.	Break annually. Destroy 1 year after break.
	e. Return receipts for registered, insured, and special delivery mail.	Break annually. Destroy 1 year after break.
	f. Report of loss rifling, delay, wrong delivery or other improper treatment of mail.	Break annually. Destroy 1 year after break.
	g. Statement of Reading Metered Registers.	Break annually. Destroy 1 year after break.
49.	Classified documents receipts, relating to the receipt or issue of classified documents.	Break annually. Destroy 2 years after break.
50.	Classified document destruction certificates, relating to the destruction of classified documents.	Break annually. Destroy 2 years after break.
51.	Classified Document Inventory Files; consisting of forms, ledgers, or registers used to show identity, internal routing, and final disposition made of classified documents, but exclusive of classified document receipts and destruction certificates and documents relating to Top Secret material covered below	Break annually. Destroy 2 years after break.
52.	Top Secret Document Accounting and Control Files.	
	a. Registers maintained at control points to indicate accountability over Top Secret documents, reflecting the receipt, dispatch, or destruction of the documents.	Destroy 5 years after documents shown on forms are downgraded, transferred, or destroyed, whichever is earlier.
	b. Forms accompanying documents to insure continuing control, showing names of persons handling the documents, intra-office routing, and comparable data.	Destroy when related document is downgraded, transferred, or destroyed, whichever is earlier.
53.	Access Request Files; consisting of requests and authorizations for individuals to have access to classified files.	Break annually. Destroy 2 years after break.
54.	Classified Document Container Security Files; consisting of forms or lists used to record safe and padlock combinations, and comparable data used to control access into classified document containers.	Destroy when superseded by a new form or list, or upon turn-in of containers, whichever is earlier.
55.	Personnel Security Clearance Status Files; maintained in security units to show the security clearance status of individuals, either in the form of lists or rosters, or as individual case files containing copies of documents contained in security case files.	Destroy lists or rosters when superseded or obsolete; destroy case files upon transfer or separation of related individual.
56.	Security Violation Files; consisting of case files relating to investigations of alleged security violations, but exclusive of files concerning felonies and papers placed in Official Personnel Folders.	Break closed cases annually. Destroy 2 years after break.
57.	Security Violation Files; consisting of case files relating to investigations of alleged security violations of a sufficiently serious nature to be classed as felonies.	Destroy 5 years after date of last action.

3.ADS.08

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
58.	Agency reports of operations tests, consisting of consolidated or comprehensive reports reflecting agency-wide results of tests conducted under emergency plans.	Destroy after next test operation.
59.	Operations Tests Files; consisting of papers accumulating from tests conducted under emergency plans, such as instructions to members participating in tests, staffing assignments, messages, tests of communications and facilities, and retained copies of reports.	Destroy 3 years after test.
60.	Correspondence files maintained by operating units responsible for administrative services pertaining to their operation and administration.	Break annually. Destroy 2 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	APPEALS This grouping of records consists of documents relating to appeal actions taken under the various laws, regulations, and rules administered by the Commission. 1. Appellate Case Files involving adverse action, reduction-in-force actions, suitability for employment, reemployment or restoration rights, discrimination, disability retirement and other decisions of the Bureau of Retirement, Insurance, and Occupational Health. Also included are hearing examiner qualifications files and ineligibility rating appeals, performance rating appeals, position classification and wage system appeals, and other miscellaneous appeals not covered elsewhere in this supplement. a. Appellate Case Files involving a minute of the Commission. b. Hearing Examiner Qualifications Files and Ineligibility Rating Appeals. (1) Active files. (2) Inactive files. c. All other case files in offices having jurisdiction over appeals. 2. Findings, recommendations and related records of discrimination complaint hearings conducted for federal agencies. 3. Recordings, stenotapes or reporters notes of transcribed hearings. 4. Control cards and other indexes to files described in item 1 above. 5. "Unsanitized" copies of field office and ARB appellate decisions forwarded to central office for review. a. "Unsanitized" copies of decisions. b. Review sheets (FEAA Form 5, or equivalent). 6. "Sanitized" copies of field office appellate decisions. a. Central office copies.	Break closed cases annually. Destroy 7 years after break. Retire to inactive files upon notice of ineligibility, determination of rating appeal, failure to update application, appointment of applicant, or applicant's reaching age of 70, whichever occurs first. Break annually. Transfer to FARC 1 year after date of break. Destroy 7 years after break. Break closed cases annually. Transfer to FARC 1 year after date of break. Destroy 7 years after break. Break annually. Destroy 7 years after break. Break annually. Destroy 1 year after break. Dispose of with related case file. Break annually. Destroy 1 year after break. Break annually. Destroy 1 year after break.

3.APP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	(1) Hard copies. (2) Microfilm copies. b. Field offices. (1) Hard copies (2) Microfiche copies	Destroy upon filming or if not filmed, break annually and destroy 20 years after break. Break annually. Destroy 20 years after break. Destroy upon receipt of microfiche. Break annually. Destroy 7 years after break.
7.	Appeals Review board (ARB) subject reference file.	Destroy individual documents when no longer needed.
8.	Reference copies of ARB decisions maintained outside ARB. a. Copies relating to interpretations of rules and regulations. b. All other copies.	Break every 3 years. Destroy 3 years after break. Break annually. Destroy 1 year after break.
9.	Record copy of Digest of Significant Decisions together with copies of decisions cited therein.	PERMANENT. Break annually. Transfer to FARC 10 years after break. Offer to NARS when 20 years old.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
BUDGET AND FISCAL		
This functional grouping of records consists of collections of documents, computer printouts and files relating to: internal payroll; work reporting and cost analysis; budget program; accounting; disbursing of funds, and other financial activities. Fiscal and accounting records of accountable officers will be transferred to the Federal Records Center in accordance with the provisions of title 8 of the GAO Policy and Procedures Manual. Agency records will be disposed of in accordance with this schedule.		
1.	Obligation copy of contract, requisition, purchase order, etc.	Dispose when funds are obligated.
2.	Individual Earnings Record (CSC Form 781 or its equivalent). File alphabetically by year. Start new file each year.	Transfer to National Federal Records Center, St. Louis, MO., when audited by GAO or after 1 year, whichever is earlier. Dispose 56 years after last entry on card.
3.	Leave record cards maintained independently of pay and earning records, including CSC Form 788, Time and Attendance Report, when used as a leave record:	
	(a) Final card showing accumulated leave on separation from Federal Service.	Close file at end of leave year. Transfer to National Federal Records Center, St. Louis, MO., 3 years after close of file. Destroy 7 years after transfer to Federal Records Center.
	(b) All other pay or fiscal copies.	Destroy after audit by GAO or when 3 years old, whichever is earlier.
4.	Record of Leave Data (SF 1150)	Destroy after audit by GAO or when 3 years old, whichever is earlier.
5.	Fiscal copy, Notification of Personnel Action (SF 50).	Destroy after audit by GAO or when 3 years old, whichever is earlier.
6.	Computer printouts - individual payroll office copies.	
	(a) Payroll register.	Destroy after retention for 1 year.
	(b) New normal rates.	Destroy after retention for 1 year.
	(c) Other deduction register.	Destroy after retention for 1 year.
	(d) Bond balance listing.	Destroy after retention for 1 year.
	(e) Master Retirement Record (MRR) listing.	Destroy when superseded or obsolete.
	(f) Master Employee Record (MER) listing.	Destroy after retention for 2 years.
	(g) Bond master file.	Destroy when superseded or obsolete.

3. BUF. 02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
7.	Payroll coding documents: i.e., CSC Forms 936, 938, and other coding documents not listed elsewhere in this schedule.	Destroy after retention for 3 months
8.	Tax Withholding Documents: (a) Withholding Tax Exemption Certificate, (such as IRS Form W-4). (b) Returns on income taxes withheld, (such as IRS Form W-2) and reports of Federal and State taxes and related items.	Destroy 4 years after certificate is superseded or obsolete. Destroy after retention for 4 years
9.	Combined Federal Campaign (CFC) and union dues authorization file: (a) CFC (b) Union dues (SF 1187 and SF 1188).	Break annually. Destroy 3 months after break. Destroy when superseded or obsolete
10.	Bond Issuance Schedule, (such as SF 1183's, etc.).	Destroy after retention for 4 years.
11.	Correspondence pertaining to payroll.	Destroy after retention for 2 years
12.	Individual authorization records of deductions for items such as health, and life insurance, bonds, etc. (a) SF 1189, SF 1198 and CSC Form 1108. (b) SF 176, SF 1192 and SF 2809 or 2810 (personnel folder copies).	Destroy when superseded or obsolete. Transfer with employee folder upon separation or transfer.
13.	Retirement Documents: Report of Withholdings and Contributions (SF 2812), Register of Separation and Transfer (SF 2807), Register of Adjustments (SF 2807-1), and Annual Summary Retirement Fund Transactions (SF 2807-2).	Destroy after retention for 4 years.
14.	Correspondence regarding lost checks and bonds and returned checks and bonds.	Break annually. Destroy 2 years after break.
15.	Memorandum copies of fiscal schedule involved in payroll processing, (file by pay period), controls for balancing and preparing reports, and control register and related totals and forms.	Destroy after audit by GAO or when 3 years old, whichever is earlier.
16.	Designated Agents (DA) files: (a) Mailing forms. (b) Mailing slips. (c) Check list by DA (Central Control Unit, CCU, entire copy). (d) List of bonds purchase (by DA) (CCU entire copy).	Break monthly. Destroy 2 months after break. Break monthly. Destroy 2 months after break. Break annually. Destroy 1 year after break. Break annually. Destroy 1 year after break.
17.	Levy records, including all papers relating to charges against salaries and retirement funds of Commission	Destroy after retention for 4 years

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	employees, maintained in central and regional Budget and Fiscal offices, Treasury Form 668A, etc.	
	Computer printouts - Commission-wide payroll.	
	(a) Final listing of transactions processed.	Destroy after retention for 1 year.
	(b) Final listing of transactions processed vs. masterfile.	Destroy when superseded.
	(c) Payroll register.	Destroy after retention for 1 year.
	(d) Other deductions register.	Destroy after retention for 1 year.
	(e) Bond masterfile transactions.	Destroy when superseded.
	(f) Status of U.S. Savings Bonds.	Destroy after retention for 1 year.
	(g) Summary of Bond Purchases.	Destroy after retention for 1 year.
	(h) Checklist to CSC, unions, and allotments.	Destroy after retention for 1 year.
	(i) Checklist to banks, individuals and composite checks.	Destroy after retention for 1 year.
	(j) Checklist to home (mailings).	Destroy after retention for 1 year.
	19. Computer printouts of work reports:	
	(a) Commission-wide new family of reports.	
	(1) Yearend summary (June 30 reports).	Destroy 3 years after end of fiscal year involved.
	(2) Complete set (other than June 30).	Destroy 3 months after end of fiscal year involved.
	(b) Regional/Bureau new family of reports	
	(1) Yearend summary (June 30 reports).	Destroy 2 years after end of fiscal year involved.
	(2) Complete set (other than June 30).	Destroy 3 months after end of fiscal year involved.
	(c) Regional/central office (CO) Cost Center new family of reports.	
	(1) Yearend summary (June 30 reports).	Destroy 3 years after end of fiscal year involved.
	(2) Complete set (other than June 30).	Destroy 3 months after end of fiscal year involved.
	(d) Regional suborganizational new family of reports.	
	(1) Yearend summary (June 30 reports).	Destroy 1 year after end of fiscal year involved.
	(2) Complete set (other than June 30).	Destroy when no longer needed.
20.	Budget, Policy and Procedure Material:	
	(a) Budget instructional material and correspondence showing Commission policy and procedures regarding budget. (Includes memoranda which constitute agreements between the CO and RO operating organizations and the budget office).	Permanent. Transfer to Executive Files when cancelled, superseded or when no longer current.
	(b) Carbon copies of memoranda which are contained in CO and RO operating organizations.	Break annually. Destroy 1 year after the close of fiscal year covered by the budget.

3. BUF. 04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
21.	Work Reports (WR) and Workload Documents: (a) Individual employee WR. (b) Workload Input Format and Workload Statistics (coding documents).	Destroy 1 year after end of fiscal year involved. Destroy after retention for 3 months.
22.	Computer printout of work report conversion list, 1st and 2d edit list, mechanical correction list (CO only).	Break quarterly. Destroy 3 months after break.
23.	Computer printout of biweekly payroll distribution.	Break quarterly. Destroy 3 months after break.
24.	Computer printout of detail in and out lists (WR) CO.	Break quarterly. Destroy 3 months after break.
25.	Computer printout of console listing (WR) CO.	Break quarterly. Destroy 3 months after break.
26.	Computer printout of corrections forms (WR) CO.	Destroy when obsolete or superseded.
27.	Computer printout of: (a) Special summary lists (WR) CO. (b) Update listing (WR) CO.	Break quarterly. Destroy 3 months after break. Break quarterly. Destroy 3 months after break.
28.	Computer printout of workload status from CO.	Break quarterly. Destroy 3 months after break.
29.	Request for X employees numbers (Employees from other agency on reimbursable basis) CO.	Destroy when obsolete or superseded.
30.	Information copies of Block Total list and Time and Attendance Control list.	Destroy when obsolete or superseded.
31.	Computer printout of special report of comparative program data.	Break annually. Destroy 2 years after break.
32.	Record copies of formal budget submission to Office of Management Budget and to the Congress, (including supporting working papers which are deemed to be necessary).	Permanent. Transfer to Executive Files when cancelled, superseded, or when no longer current.
33.	Budget Correspondence: (a) Correspondence files of the Budget and Fiscal Division, consisting of correspondence regarding current operations insofar as budget matters are concerned. (b) Carbon copies of above correspondence which are maintained in bureau, staff offices and regional office files.	Destroy 2 years after the close of the fiscal year covered by the budget. Destroy 2 years after the close of the fiscal year covered by the budget.
34.	Budget Estimate Material: (a) Cost statements and rough data accumulated in the preparation of annual budget estimates.	Destroy 1 year after the close of the fiscal year covered by the budget.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	(b) Duplicates of submissions and work papers in the operating organizations.	Destroy 1 year after the close of the fiscal year covered by the budget.
	(c) Work papers accumulated in the preparation of year estimates in operating organizations and regional offices.	Destroy 1 year after the close of the fiscal year covered by estimates.
	(d) Annual budget estimate-computer printout.	Destroy 1 year after the close of the fiscal year covered by estimates.
35.	Reports on Appropriations, Apportionment, and Reapportionment: (a) Periodic reports on the status of appropriation accounts and apportionment and reapportionment schedule, i.e., SF 132, 133, etc. (b) Copies of submissions in operating organizations, i.e., SF 220 and supporting schedules, BA 6727 and 6728, BA-R2108, etc.	Destroy 5 years after the end of fiscal year covered by the report. Destroy 4 years after the end of the fiscal year covered by the reports.
36.	Schedules of certificate of settlement of claims settled by GAO.	Destroy 2 years after date of settlement.
37.	Report of survey covering lost, destroyed, damaged or stolen property, and other papers used as evidence of adjustment of inventory records.	Destroy 2 years after date of posting medium.
38.	Accountable officers return comprising memorandum copies of SF 224, all supporting vouchers, schedules, documents, and related papers not otherwise accounted for in this schedule (excluding freight and payroll records).	Destroy after audit by GAO or when 3 years old, whichever is earlier.
39.	Records relating to the availability, collections, custody and deposit of funds, including appropriation warrants (other than records covered by item 25).	Destroy 4 years after date of document.
40.	Records used as supporting and control media, subsidiary to the general and allotment ledgers, and not otherwise provided for in the schedule. (a) Original records. (b) Copies.	Destroy after retention for 4 years. Destroy after retention for 2 years.
41.	Instructional material (administrative manuals, etc.) on fiscal and accounting matters; i.e., payroll, vouchers, retirement, leave. (a) Original file. (b) Copies.	Permanent. Transfer to Executive Files when cancelled, superseded, or when no longer current. Destroy when superseded or obsolete.
42.	Administrative correspondence, reports and data relating to voucher preparation, administrative audit, and other miscellaneous accounting and disbursing operations not specifically covered elsewhere.	Destroy after retention for 4 years
43.	Monthly Report of Employment (SF 113W, Budget and Fiscal copy).	Break annually. Destroy 2 years after close of fiscal year.

3. BUF. 06

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
44.	Papers covering passenger transportation charges, consisting of vouchers and related papers, (individual travel papers are covered by BUF #45).	
	(a) Memorandum copy.	Destroy 3 years after period covered by related account.
	(b) Obligation copy, if different from copy described in item BUF 45.	Break annually. Destroy 2 years after break.
45.	Records maintained in travel administrative unit, relating to official travel of officers, employees, dependents, or others authorized to travel by law: consisting of copies of travel orders, per diem vouchers, transportation requests, hotel reservations and all supporting papers relating to official travel (exclusive of records covered by item ADS-41 and item BUF-44.	Break annually. Destroy 4 years after break.
46.	Applications and statements for advance of funds.	Destroy 2 years after repayment of advance.
47.	Records, freight and passenger, not otherwise covered in this schedule.	
	(a) Correspondence, forms and related papers pertaining to agency travel and transportation functions.	Destroy after 2 years.
	(b) Accountability records.	Destroy 1 year after all entries on the records are cleared.
48.	Computer printout of input control listing (accounting).	Destroy 3 years after end of fiscal year involved.
49.	Computer printout of document master update listing (accounting).	Destroy 3 years after end of fiscal year involved.
50.	Computer printout of open document listing:	
	(a) End of fiscal year summary.	Destroy 1 year after end of fiscal year involved.
	(b) Complete set (other than June 30).	Destroy when reconciled.
51.	Computer printout of open document listing - General Ledger Account.	Destroy when superseded or obsolete.
52.	Computer printout of consolidated status of allotment.	Destroy 1 year after close of fiscal year involved.
53.	Computer printout of detail status of allotment.	Destroy 3 years after end of fiscal year involved.
54.	Computer printout of biweekly Obligations Report.	Break quarterly. Destroy 1 year after end of fiscal year involved.
55.	Computer printout of Status of Cost Reports:	
	(a) Consolidated status of cost (June 30, Summary).	Destroy 3 years after end of fiscal year involved.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	(b) Bureau level status of cost (June 30, Summary).	Destroy 3 years after end of fiscal year involved.
	(c) Cost Center level status of cost (June 30, Summary).	Destroy 3 years after end of fiscal year involved.
	(d) Suborganization status of cost (June 30, Summary).	Destroy 1 year after end of fiscal year involved.
	(e) All levels other than June 30, summaries.	Destroy when no longer needed.
56.	Computer printout of appropriation limitation.	Destroy 1 year after end of fiscal year involved.
57.	Computer printout of trial balance (June 30, Final).	Destroy 3 years after end of fiscal year involved.
58.	Computer printout of Public Service Career status of cost.	Destroy 1 year after end of fiscal year involved.
59.	Computer printout of of miscellaneous BRION reports.	Destroy 1 year after end of fiscal year involved.
60.	Computer printout of Report on Budget Status.	Destroy 1 year after end of fiscal year involved.
61.	Computer printout of Fixed Asset Report.	Destroy 1 year after end of fiscal year involved.
62.	Computer printout of status of allotment for IPA.	Destroy 3 years after end of fiscal year involved.
63.	Computer printout of listing of transactions by Cost Center.	Destroy when superseded.
64.	Computer printout of Revolving Fund - Asset and Depreciation:	
	(a) End of fiscal year summary.	Destroy 3 years after end of fiscal year involved.
	(b) Other copies.	Destroy 1 year after end of fiscal year involved.
65.	Computer printout of statement of revenue, expenses and retained earnings, Revolving Fund.	Destroy 3 years after end of fiscal year involved.
66.	Computer printout of income vs. cost-Revolving Fund (Appropriation 20).	Destroy 1 year after end of fiscal year involved.
67.	Computer printout of income vs. cost - S & E (Appropriation 12).	Destroy 1 year after end of fiscal year involved.
68.	Computer printout of Report on Obligations (SF 225).	Destroy 1 year after end of fiscal year involved.
69.	Computer printout of Report on Disbursing Officers schedules processed - Cash Reconciliation Report.	Destroy on completion of reconciliation.
70.	Computer printout of listing of equipment transaction - equipment dump.	Destroy on completion of reconciliation.

3. BUF. 08

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
71.	Computer printout of Master Code Description File (MCDF) end of fiscal year copy.	Break annually by fiscal year. Destroy 3 years after end of fiscal year involved.
72.	Computer printout of all listings of raw data transmitted by regions - (hard copies); payroll, work reports and accounting paper tape).	Destroy after retention for 3 months.
73.	Document History Records.	Destroy after retention for 3 months.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	B&F COMPUTER TAPES The Bureau of Manpower Information Systems will retain the following magnetic tape files, related software programs, basic run instructions, etc., for the periods shown.	
1.	Payroll	
	(a) End of Pay Year MER	Dispose 4 years after end of fiscal year.
	(b) End of Pay Year IER	Dispose 4 years after end of fiscal year.
	(c) End of Pay Year MRR	Dispose 4 years after end of fiscal year.
	(d) Pay period transaction tapes.	Dispose 2 years after end of fiscal year.
2.	Accounting	
	(a) Final June 30 Master History File.	Dispose 7 years after end of fiscal year.
	(b) Final June 30 Master Code Description File.	Dispose 7 years after end of fiscal year.
	(c) Report Programs	
	- AC064 - Trail Balance	Dispose 7 years after end of fiscal year.
	- AC020 - Status of Allotments	Dispose 7 years after end of fiscal year.
	- AC060 - Transaction Listings.	Dispose 7 years after end of fiscal year.
3.	Work Reports	
	(a) Final June 30 Master File.	Dispose 4 years after end of fiscal year.
	(b) Final June 30 Master Code Description File.	Dispose 4 years after end of fiscal year.
	(c) Final June 30 Report Programs.	Dispose 4 years after end of fiscal year.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	CLASSIFICATION AND COMPENSATION This functional grouping of records consist of collections, papers and files relating to Government-wide position classifications and standards; job evaluations; pay and leave regulations; travel and transportation regulations, etc. SEE: APPEALS AND LEGAL for appeal cases; SPECIAL CATEGORIES for positions in Schedules A, B, and C, and supergrades.	
1.	Approved drafts of classification standards showing the basic data used in the development of the standards.	Disposal not authorized. Transfer to Central Reference when file becomes inactive.
2.	Working papers including rough drafts, notes, correspondence with Federal agencies and regional offices pertaining to classification standards and other related papers not having a substantive bearing on the development of the standard.	Destroy 6 months after publication of approved standard.
3.	Processed copies of classification standards.	Destroy when standard is superseded or declared obsolete.
4.	Approved drafts of Probational Examination Specifications and standards showing the basic data used in the development of the standard.	Disposal not authorized. Incorporate in 'standards' file (item 1 above).
5.	Approved drafts of Probational Examination Specifications and standards for positions for which no standard has been published.	Disposal not authorized. Incorporate in 'standards' file (item 1 above) when standard is published.
6.	Working papers, including rough drafts, notes and related papers pertaining to the development of Probational Examination Specifications and standards.	Destroy 6 months after publication of approved specifications or standards.
7.	Processed copies of Probational Examination Specifications and standards. (a) One complete set in each regional office and the Central Office. (b) Other processed copies.	Retain for reference. Review annually. Dispose of all copies of no further value.
8.	Index Card to Probational Examination Specifications and standards (Form X10-20 or equivalent).	Disposal not authorized. Retain for reference use.
9.	Position Classification File: Standard Form 75, or equivalent, Individual Position Classification Sheets submitted by agencies for classification action. File by series.	Destroy upon publication of position classification standards covering each series.
10.	Executive Order 10,000 File (regulations governing salary differentials): Draft of Order, research material and correspondence between the Bureau of the Budget and the Commission prior to the issuance of the Executive Order.	Disposal not authorized. transfer to Central Reference when file becomes inactive.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	COMMITTEE MANAGEMENT This grouping of records consists of documents relating to the organization and activity of boards, committees, councils, groups, etc. over which the Commission has administrative jurisdiction. 1 Charters, agendas, minutes, summaries of meetings or conferences and reports of boards, committees, councils, groups, etc. over which the Commission has administrative jurisdiction, such as the Interagency Advisory Group, the Federal Prevailing Rate Advisory Committee, the Federal Employees Pay Council and the Loyalty Board. a. Files maintained by secretary of board, committee, council, group, etc. b. Files maintained by individual members.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Destroy when no longer needed.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYEE DEVELOPMENT AND UTILIZATION This grouping of records consists of documents relating to the Government-wide programs on employee development activities and employee incentives. 1. Incentive awards reports. a. Annual reports. b. Semi-annual reports. 2. Agency training agreements; agreement between the CSC and a Federal department or agency wherein an intensified training program is created to supplement the qualifications of individuals or trainees in an occupational series in order to expedite their meeting the requirements for promotion to higher grade positions. a. Agency-wide agreement (approved by the central office for agency-wide application). b. Regional agreements (approved by regional office for application by individual agency establishments). c. Copies of the above agreements. 3. Training program records; correspondence and reports relating to establishment of training courses and supervision of training program at Training Centers and Executive Seminar Centers (excluding correspondence and reports covering routine administrative actions and evaluations as defined in ADM). a. Office responsible for approval of training courses and supervision of training program. b. All other offices. 4. Training course records; consisting of announcements, agendas, curriculum, card registrations, rosters of participants, evaluations, billing information, and other documents related to delivery of courses.	Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break. Break expired agreements annually. Transfer to FARC 1 year after break. Destroy 6 years after break. Break expired agreements annually. Destroy 2 years after break. Break expired agreements annually. Destroy 1 year after break. PERMANENT. Break annually. Transfer to FARC 3 years after break. Offer to NARS when 20 years old. Break annually. Destroy 3 years after break. Break annually. Transfer to FARC 2 years after break. Destroy 5 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYMENT This grouping of records consists of documents relating to Government-wide employment processes such as certification of eligibles, selections, appointments, placements, transfers, conversions, etc.	
1.	Request for prior approval of personnel actions taken by agencies on such matters as promotion, transfer, reinstatement, change in status, etc., submitted by SF 59, CSC 648, or equivalent forms.	Break annually. Destroy 1 year after break.
2.	Certificate Files: Contains SF 39, SF 39A, and all papers upon which the certification was based; that is, detailed rating schedule, record of selective and quality ranking factors used, list of eligibles screened for the vacancies, ratings assigned, availability statements, and other documentation material designated by the examiner for retention. It is recommended that both the file copy and the audited report copy of the certificate be kept in this file. However they are kept, files should be arranged to permit reconstruction or validation of actions taken in the event of appeal or legal action.	Break annually. Destroy 5 years after break. (Files may be transferred to FARC 2 years after break).
3.	CSC Form 3918, or equivalent, Index Control Card; certification request control index.	Break annually. Destroy 1 year after break.
4.	Conversion Case Files; letters and certificates pertaining to acquisition of competitive status.	
	a. Conversion Case Files processed under FPM Chapter 315, Subchapter 7 (conversion in rare cases).	Break annually. Destroy 10 years after break.
	b. Conversion Case Files involving minute action.	Break annually. Destroy 10 years after break.
	c. Other Conversion Case Files.	Break annually. Destroy 5 years after break.
5.	Files pertaining to the establishment of term appointment authorities.	Break annually. Destroy 10 years after break.
6.	Displaced Employee Program (DEP) application and registration sheet.	Destroy upon expiration of employee's DEP eligibility.
7.	DEP control cards, if maintained.	Break annually. Destroy 2 years after break.
8.	Files pertaining to agreements for appointment of experts and consultants.	Break expired agreements annually. Destroy 5 years after break.
9.	Written Amendment Waiver Case Files.	Break annually. Destroy 5 years after break.

3.EMP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
10.	Superior Qualification Appointment Files (payment above minimum rate).	Break annually. Destroy 5 years after break.
11.	Dual Compensation Case Files. DOD requests for appointment of military retirees who have retired less than 180 days.	
	a. Minute Cases.	Break annually. Destroy 10 years after break.
	b. Other Cases.	Destroy 3 years after action was taken.
12.	Minute case files relating to requests for waiver of reduction-in-retired-pay provisions of the Dual Compensation Act.	Break annually. Destroy 10 years after break.
13.	Case files relating to requests for exception to dual employment restrictions.	Break annually. Destroy 10 years after break.
14.	Travel and Transportation Case Files relating to transportation to first post of duty.	Break annually. Destroy 4 year after break.
15.	Files accumulated in connection with special hiring rates.	
	a. Cases of approved special hiring rates.	Break annually cases on which special hiring rates have terminated. Destroy 1 year after break.
	b. Cases of disapproved special hiring rates.	Break annually. Destroy 1 year after break.
	Employment Statistics, Reports, and Publications.	
16.	Publications Files. Printed publications and related statistical issuances produced from survey reports.	
	a. One official file copy.	PERMANENT. Transfer to FRC when 5 years old. Offer to NARS when 10 years old. (Also see ADM 9a).
	b. Other copies.	Destroy when obsolete or no longer needed for reference, whichever is sooner.
17.	Monthly Input Reports Files. Input reports required by the Commission or other Government agency from the various departments and agencies of the Federal government.	
	a. Punched cards prepared from reports.	Destroy when information on magnetic media has been verified.
	b. Hardcopy input report.	Destroy 3 years after publication.
	c. Valid transaction tapes.	Erase after third update cycle.
	d. Tabulations (printouts).	Destroy after microfilming or when no longer needed for reference, whichever is sooner.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	e. Microfilm of tabulations.	Destroy when obsolete or no longer needed for reference, whichever is sooner.
18.	<u>Annual Input Reports Files.</u> Input reports required by the Commission or other Government agency from the various departments and agencies of the Federal government. a. Punched cards prepared from reports. b. Hardcopy input report. c. Valid transactions tapes. d. Tabulations (printouts). e. Microfilm of tabulations.	Destroy when information on magnetic media has been verified. Destroy after second subsequent publication is printed. Erase after third update cycle. Destroy after microfilming or when no longer needed for reference, whichever is sooner. Destroy when obsolete or no longer needed for reference, whichever is sooner.
19.	<u>Miscellaneous Input Reports Files.</u> Input reports not covered by Item 17 and 18 of this schedule. These are usually one time survey reports. a. Punched cards prepared from reports. b. Hardcopy input report. c. Reserved. d. Tabulations (printouts). e. Microfilm of tabulations.	Destroy when information on magnetic media has been verified. Destroy on termination of program. Destroy after microfilming or when no longer needed for reference, whichever is sooner. Destroy when obsolete or no longer needed for reference, whichever is sooner.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYEE RELATIONS AND SERVICES This grouping of records consists of documents relating to the Government-wide labor-management and equal employment opportunity programs. 1. EEO affirmative action plans; plans submitted by Federal agencies to the Commission, with correspondence relating to the Commission's review of individual plans. a. Central office files. b. Regional office files. 2. Disposition reports on discrimination complaints handled and closed by Federal agencies (CSC Form 1117, or equivalent). 3. Federal agency activity reports on discrimination complaints and pre-complaint counseling. 4. EEO "Reprisal" Case Files; cases reviewed by the Commission under authority of 5 CFR 713.262b. 5. Unfair Labor Practices Case Files; consisting of complaints of unfair labor practices, responses thereto, briefs, and decisions rendered by the Assistant Secretary of Labor for Labor-Management Relations under terms of E.O. 11491 as amended. 6. Labor-management contract agreements; copies of negotiated agreements between Federal agencies and employee unions. a. Hard copies. b. Microfilm copies. 7. Arbitration decisions; copies of arbitration decisions involving interpretation of contract agreements between Federal agencies and employee unions. a. Hard copies. b. Microfilm copies.	Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break. Break monthly. Destroy 2 years after break. Break annually. Destroy 2 years after break. Break annually. Transfer to FARC 1 year after break. Destroy 7 years after break. Break closed files annually. Destroy 7 years after break. Break annually. Destroy within 2 years after break. If not filmed, break annually and destroy 20 years after break. Break annually. Destroy 20 years after break. Break annually. Destroy 10 years after break. If not filmed, destroy when reference purposes have been served. Destroy when reference purposes have been served.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EVALUATIONS This group of records consists of documents relating to the Government-wide personnel management evaluation program.	
1.	Personnel management evaluations and special studies.	
	a. Agency-wide evaluations and special studies.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 15 years old.
	b. All other evaluation reports and special studies.	Break annually. Destroy 10 years after break.
2.	Working papers for item 1 above.	Break annually. Destroy 4 years after break or after issuance of subsequent report, whichever is earlier.
3.	Personnel management evaluation program and Fair Labor Standards Act (FLSA) statistics.	Break annually. Destroy 7 years after break.
4.	Position Classification Advisory File; consisting of individual position classification sheets submitted by agencies and Commission's report of investigation, including certified approvals of actions furnished by agencies.	Break annually. Destroy 7 years after break.
5.	Third-party complaints of discrimination; consisting of case files relating to examination of discrimination allegations against federal agencies filed by groups or individuals not entitled to institute first-party complaints and forwarded to the Commission for review and recommendations.	
	a. Case files.	Break closed cases annually. Destroy 3 years after break.
	b. Copies of decisions maintained for public inspection.	Break annually. Destroy 5 years after break.
6.	FLSA case files; concerning requests by individual for compensation under the FLSA.	Break closed cases annually. Destroy 7 years after break.
7.	Merit System Investigation Case Files; concerning investigations of individuals for merit system abuses and the resulting report, if any.	Break closed cases annually. Destroy 7 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EXAMINING AND RECRUITING	
	This grouping of records consists of documents relating to the Government-wide examination and recruitment programs.	
1.	Examination Record Card File.	Break every 3 years and transfer to FARC after break. Destroy 3 years after break.
2.	Correspondence concerning accommodations for holding examinations.	Break annually. Destroy 1 year after break.
3.	Correspondence relating to the shipment of examination papers and test material.	Break annually. Destroy 1 year after break.
4.	Stock control records of examination test material including running inventory of test material in stock.	Destroy when test is superseded or obsolete.
5.	Test material.	
	a. Reserved.	
	b. Working papers, including background material, studies, analyses notes, rough drafts, and related non-permanent papers pertaining to the development of test items.	Destroy 6 months after approval of test item, or 3 years after development of test item, if not approved.
	c. Processed copies of tests, rating keys, rating schedules, rating instructions, and transmutation tables, including stencils and plates used for reproduction purposes.	Destroy when obsolete or when no longer needed.
6.	CSC Form 5000A, or equivalent, Application Record Card.	Break after examination. Destroy no later than 90 days after break.
7.	Designation Examination File; consisting of answer sheet, list of rating and correspondence relating to examinations given as a courtesy to members of Congress for selection of candidates to the United States military academies.	Break annually. Destroy 1 year after break.
8.	Examination Announcement Case Files; consisting of correspondence regarding the examination requirements, original drafts of examination and announcement issued (exclusive of correspondence, and other records concerning qualification standards, job specifications and their development).	Destroy 5 years after termination of related register.
9.	Reference sets of each nation-wide, regional and local announcement maintained in central and regional offices.	Destroy 3 years after termination of related register.
10.	Other processed copies of examination announcements wherever maintained for convenient reference.	Destroy when obsolete or superseded.

3.EXR.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
11.	Register of eligibles; CSC Form 5001-C, or equivalent document that records eligibility of an individual for Federal jobs.	Break records on individuals with terminated eligibility annually. Transfer to FARC 1 year after break. Destroy 6 years after break.
12.	Letters to applicants denying transfer or eligibility (CSC Form 4896, or equivalent).	Break annually. Destroy 1 year after break.
13.	Notices received from eligibles indicating change in name, address, or availability.	Destroy immediately after posting.
14.	Cancelled and ineligible applications including the application, supplemental forms, and attachments submitted with the application.	Ineligible applications are usually returned to the applicant with the notice of ineligibility. Destroy ineligible applications not returned and cancelled applications 1 year after date of action or when register is terminated, whichever is sooner.
15.	Written test answer sheets for both eligibles and ineligibles.	Break annually. Destroy 1 year after break.
16.	Applications and examination papers for District of Columbia police and firemen promotion examinations.	Destroy 6 months after establishment of new register.
17.	Lost or Exposed Test Material Case Files showing the circumstances of the loss, nature of the recovery action and corrective action required.	Break closed files annually. Destroy 5 years after break.
18.	Correspondence incurred between CSC, Members of Congress, the White House, or the general public concerning applications, eligibles, certification and all other examining and recruiting operations.	Break annually. Destroy 1 year after break.
19.	Internal activity reports.	Break annually. Destroy 1 year after break, except those with statistical significance may be kept 5 years.
20.	Eligible applications.	
	a. On active register.	Destroy upon termination of the register (except applications that may be brought forward to new register, if any).
	b. On inactive register.	Destroy 1-12 months after eligibles are placed on inactive register, depending on space availability and difficulty of replacing the application for restoration.
21.	Job Interest Cards.	Retain at least 3 months in an active status depending upon availability and volume of candidates on file. Retain inactive cards at least 6 months for responding to appeals and as back-up source.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
22.	Summer Employment Eligibles Record Card, CSC Form 918, or equivalent.	Destroy as soon as register is terminated by establishment of a new register.
23.	Alphabetical listings of summer examination eligibles.	Destroy 1 year after establishment of listing.
24.	Used test booklets.	Destroy 30 days after date of examination.
25.	Examiner Membership CSC Form 1660 or equivalent; consisting of nominations of Federal employees to serve as members, special or panel, of the area office.	Destroy individual forms upon membership termination.
26.	Area offices, Federal Job Information Centers and examination points; establishment, abolishment or change of address.	Break annually. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INFORMATION SERVICES This grouping of records consists of documents relating to the public relations and information services provided by the Commission.	
1.	Record set of press releases, consisting of one published copy of each release.	PERMANENT. Break annually. Offer to the NARS periodically.
2.	Record set of official addresses and speeches delivered by the Commissioners, Executive Director, and heads of bureaus and staff offices.	PERMANENT. Break annually. Offer to NARS periodically.
3.	Information releases. a. Record copy of each report, booklet, pamphlet or other Commission information release or publication that contributes to an understanding of the organization, methods, procedures, accomplishments or functions of the Commission. b. Information releases or publications that do not furnish a substantive documentation of the Commission's activities or functions, such as check lists of publications, news digests, examination announcements, routine employee letters, etc.	PERMANENT. Break annually. Offer to National Archives periodically. Destroy when superseded or obsolete.
4.	Working papers for all documents described in 3 above including questionnaires, collections of raw data, studies, analyses, notes, rough drafts, interim reports, etc.	Destroy 6 months after publication or 3 years after completion of final draft if document is not formally published.
5.	Information photographs and related indexes. a. Information photographs documenting Commission functions and programs. (1) Master negative, single captioned positive available, and number job or control cards. (2) Extra prints, proof sheets, and other materials relating to processing of requests for photograph. b. Photographs of minimal value with little documentation or historical importance, such as photographs of retirement luncheons, service award ceremonies, etc.	PERMANENT. Offer to NARS after 10 years or when no longer required for operational purposes, whichever occurs first. Destroy at time of offering permanent records to NARS, or when no longer needed for operational purposes, whichever occurs first. Destroy when no longer needed for operational purposes.
6.	Motion pictures, video tapes and other audio-visual presentations by or for the Commission used for promotion, information or education purposes. a. For each motion picture, the original negative, a master positive and a positive print; for each video tape, the original or the earliest generation or a kine-scope; for each disc sound recording, the master tape matrix or stamper; for each magnetic audio tape, the original tape.	PERMANENT. Offer to NARS after 10 years or when material no longer needed for operational purposes, whichever occurs first.

3.INF.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Other copies.	Destroy when no longer needed for operational purposes.
7.	Finding aids and production documentation for audio visual records: existing finding aids such as data sheets, shot lists, catalogs, indexes, and other textual documentation needed for the proper identification, retrieval and use of audiovisual records, as well as production case files or similar files which include copies of contracts, scripts, transcripts or other documentation bearing on the origin, acquisition, release, or ownership of the audiovisual production.	PERMANENT. Offer to NARS with related audiovisual records.
8.	Ephemeral correspondence; consisting of incoming letters and replies thereto involving no administrative action, such as requests for information, publications, relative standing on registers, etc.	Break annually. Destroy 1 year after break.
9.	Anonymous letters, letters of commendation, complaint, criticism and suggestion, and replies thereto, excluding those on the basis of which investigations were made or administrative action taken and those incorporated in individual personnel records.	Destroy when 3 months old.
10.	Daily press service teletype news.	Destroy when 3 months old.
11.	Information services project case files maintained in formally designated information offices.	Break closed files annually. Destroy 1 year after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INSURANCE This grouping of records consists of documents relating to the administration of Federal Employee's Group Life and Health Benefits Programs. 1. Legal and Legislative Reference Files; maintained by office responsible for technical advice on legislative and policy matters effecting the retirement, health benefits, and life insurance programs. a. Legal Subject Files; reference material and corresponding indexes relating to documentation of precedent decisions and policy determinations effecting the retirement, health benefits, and life insurance programs, and to review cases forwarded to the Appeals Review Board. b. Legislative Subject Files; reference material and corresponding indexes relating to proposed and enacted legislation effecting the retirement, health benefits, and life insurance programs. 2. Health Benefits and Life Insurance Contract Files; consisting of copies of official agreements with carriers for Federal employee health benefits and life insurance plans, together with correspondence and other documentation relating to the negotiation and interpretation of rates and benefits. a. Office responsible for negotiation of agreements with carriers. b. Other offices. 3. Official contracts; record copy of agreements with carriers for Federal employee health benefits and life insurance plans. 4. Claims correspondence; correspondence with individuals or carriers representatives on interpretation of contracts and settlement of Federal employee claims under health benefits and life insurance plans. a. Correspondence on routine contract problems and contract interpretations. b. Correspondence on non-routine contract interpretations or unusual claims problems.	relating to the Insurance Break every 5 years or earlier, if volume warrants. Transfer to FARC 15 years after break or when administrative use has ceased, whichever occurs first. Destroy when 25 years old. Break by term of Congress. Transfer to FARC 15 years after break or when administrative use has ceased, whichever occurs first. Destroy when 25 years old. PERMANENT. Break completed contracts annually. Ten years after break: (1) Destroy portion of files relating to compilation of Federal employee brochure, and (2) transfer remainder of files to FARC. Offer to NARS when 20 years old. Break completed contracts annually. Destroy 3 years after break. Break signed contracts annually. Transfer to Boyers after break. Destroy 20 years after break. Break annually. Destroy 2 years after break. Break annually. Destroy 5 years after break or when administrative needs have been served, whichever occurs first.

3.INS.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
5.	Constitutions and bylaws of Federal employee organizations.	Destroy when superseded or obsolete.
6.	Accounting statements.	
	a. Instructions to carriers regarding preparation of accounting statements with related documentation.	Break annually. Transfer to Boyers 5 years after break. Destroy 20 years after break.
	b. Carrier reports; interim and annual accounting statements of health benefits carriers, together with documents relating to analyses of carrier reports.	Break annually. Transfer to Boyers 5 years after break. Destroy 20 years after break.
7.	Financial schedules; forms and charts summarizing fiscal operations of life insurance, health benefits, and retirement programs.	Break annually. Destroy 20 years after break or when updated or obsolete, whichever occurs first.
8.	Audit reports of health benefits and life insurance carriers, and backup documents together with correspondence relating to resolution of findings.	Break closed files annually. Transfer to FARC 3 years after break. Destroy 10 years after break.
9.	Correspondence relating to conduct of audits.	Break annually. Destroy 3 months after break.
10.	Utilization reports on health benefits programs; consisting of statistical analyses used for the conduct of actuarial studies and derived from carrier reports on operations of health benefits programs:	
	a. Hard copies.	Destroy after filming. If not filmed, break annually and destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	b. Microfilm copies.	Break annually. Destroy 30 years after break or when administrative needs have been served, whichever occurs first.
11.	Statistical reports and annuitant evaluations of retirement and life insurance programs; consisting of statistical analyses used for the conduct of actuarial studies and based on the operation and projected costs of retirement and life insurance programs.	
	a. Hard copies.	Destroy after filming. If not filmed, break annually and destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	b. Microfilm copies.	Break annually. Destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	c. Auxiliary tabulations.	Destroy when accuracy of summary pages has been determined.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INTERGOVERNMENTAL PERSONNEL PROGRAMS This grouping of records consists of documents relating to the implementation of the Intergovernmental Personnel Act.	
1.	Grant-in-Aid Case Files (funded and unfunded); consisting of approved applications for assistance, including but not limited to evaluations, press releases, narrative statements, fiscal and budget information, monitoring reports, final reports, impact assessments and related documents. a. Cases maintained by the office which provides grants management. b. Information copies maintained by all other offices. c. Rejected grant applications.	Break terminated grants annually. Destroy 5 years after break or after audit by GAO, whichever is earlier. Break copies pertaining to terminated grants annually. Destroy 2 years after break or when no longer needed for reference, whichever is earlier. Break annually. Destroy 2 years after break.
2.	Grant products; information copies of publications, films, slides, and comparable items prepared as a result of the grant but not part of the grant file.	Destroy when superseded or obsolete.
3.	State Plan Files; consisting of laws, rules, regulations job classifications and comparable material received from state and local governments relating to merit systems.	Destroy when superseded or obsolete.
4.	State program correspondence and related documents accumulated in monitoring merit systems at the state and local levels.	Break every 3 years and transfer to FARC. Destroy 3 years after break.
5.	Technical assistance agreements and products maintained by the managing office.	
	a. Reimbursable agreements.	Break terminated agreements annually. Destroy 5 years after break or after audited by GAO, whichever is earlier.
	b. Non-reimbursable agreements.	Break terminated agreements annually. Destroy 2 years after break.
6.	Technical assistance agreements and products maintained by other offices.	Break terminated agreements annually. Destroy 2 years after break or when no longer needed for reference, whichever is earlier.
7.	Survey, study, and project files relating to quantitative or qualitative reviews on merit systems, salary, equal employment and comparable areas of responsibility.	

3.IPP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	a. Published or unpublished final report.	PERMANENT. Break annually, offer to NARS in 3 year blocks when 5 years old.
	b. Background materials maintained relating to item 7a.	Destroy when superseded or obsolete or after publication of report, whichever is earlier.
	c. Feeder reports.	Destroy after publication of report or 2 years after submission of report, whichever is earlier.
8.	Assignment agreements between Federal Government and State and local governments relating to the interchange or assignment of personnel in the mobility program.	
	a. Records maintained by the approving office.	Break closed agreements annually. Destroy 5 years after break.
	b. All other copies.	Break closed agreements annually. Destroy 1 year after break.
9.	Promotional materials relating to the mobility program.	Break every 2 years. Destroy 1 year after break.
10.	Cards containing information on assignment agreements used in preparing reports.	Destroy when superseded or obsolete.
11.	Statistical reports relating to assignments under the mobility program.	Break annually. Destroy 5 years after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INVESTIGATIONS This grouping of records consists of documents relating to the Government-wide investigative program. 1. Investigative Case Files. a. Record copies of reports and related papers maintained in the Bureau of Personnel Investigations (BPI). b. Copies of reports, related papers, and investigator notes retained in Regional Investigations Division (RID). (1) Copies of region of origin cases. (2) Copies of participating region cases. (3) Copies of spot checks, personal confidential inquiries, and personal record searches. (4) Copies of political activity, and other special types of investigative cases. c. Bar and Flag Files, excluding medical flags. (1) Record copies of closed cases resulting in debarment or flagging. (2) Regional office copies of closed cases which result in debarment or flagging. 2. National Agency Check and Inquiry Case Files; includes inquiry forms, results of National Agency Checks, and related case papers. a. Files marked "Clear - file retained in region for destruction" under instructions in FPM Supplement 736-72 (Internal). b. Files marked "File to BPI" under instructions in FPM Supplement 736-72 (Internal). 3. Security Investigations Index (SI), central office index to personnel investigations.	Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases monthly. Destroy 2 months after break. Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old. "When an investigation file is not maintained, remove from active files 2 years from date of final action and put in "Disclosure Accounting" file for additional 5 years, then destroy. Remove all other cards from active files 20 years after the date of final action and destroy.

3. IIV.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. a. Central Office (BPI) b. Washington Division of Investigations (WDI) and RID.	Break closed cards annually. Destroy 2 years after break. Break closed cards semi-annually. Destroy 6 months after break.
5.	Desk Case Control File; card record of pending cases maintained by deadline date in BPI, WDI and RID.	Destroy when case is closed.
6.	Investigations Security Reference File.	Destroy upon completion of program.
7.	Loyalty Conversion to FBI and Record of Processing FBI Investigation File (In Form 131, or equivalent).	Break annually. Destroy 2 years after break.
8.	Regional office evaluation reports.	Break annually. Destroy 5 years after break.
9.	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
10.	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
11.	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of CSC investigative file, or destroyed if investigative file belongs to another agency.
12.	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
13.	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
14.	Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FPM Supplement (Internal) 736-72.	Break annually. Destroy 3 years after break.
15.	CSC Form 2799, or equivalent, Daily Report of Investigator.	Break quarterly. Destroy no later than one year after break.
16.	Security program workload report.	Break annually. Destroy 1 year after break.
17.	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
19.	Relocation File; folders containing duplicate information relating to personnel investigation and adjudications which warrant retention at a relocation site for use in the event of a national emergency.	Transfer to relocation site when sufficient number available.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	LEGAL This grouping of records consists of documents relating to legal services provided for CSC activities and the Commission's participation in the Voting Rights program.	
1.	Political Activity (Hatch Act) Case Files.	
	a. Basic case file; consisting of letters of charges, hearing reports, and notices of action taken.	Break closed cases annually. Transfer to FARC 1 year after break. Destroy 7 years after break.
	b. Reference copies filed by subject in the Office of the General Counsel.	Break closed cases annually. Destroy 3 years after break.
	c. All other reference copies.	Break copies on closed cases annually. Destroy 1 year after break.
2.	Files on court cases. (See ADS 30 for tort claims).	Break closed case annually. Transfer to FARC 1 year after break. Destroy 7 years after break.
3.	Legislative Bill Files.	
	a. Correspondence, reports, and documentation relating to establishment of Commission position on legislative proposals.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to National Archives when 15 years old.
	b. Copies of proposed legislation maintained for informational purposes.	Destroy immediately upon adjournment of related session of congress.
4.	Voting Rights Program Records.	
	a. Eligibility lists and challenge files.	Transfer to FARC after date of election for which prepared. Destroy 75 years after date of election for which prepared.
	b. Voter applications and copies of registration certificates.	Transfer to FARC after date of election for which prepared. Destroy 15 years after date of election for which prepared.
	c. Examiner reports on voting rights activity and voting rights applicants.	
	1. Central office copies.	Break quarterly and transfer to records staging area. Destroy 2 years after break.
	2. Regional office copies.	Destroy 1 year after date of election for which prepared.
	d. Observer reports.	

3.LEG.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	1. Central office copies. 2. Regional office copies.	Break quarterly and transfer to records staging area. Transfer to the Department of Justice 2 years after break. Break quarterly. Destroy 3 months after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	MEDICAL This grouping of records consists of documents relating to both the internal and Government-wide medical program and services. 1. Government-wide pre-employment, periodic requalification, and fitness for duty physical examinations (SF 78, or equivalent) filed in or associated with Official Personnel Folder. (Maintain in accordance with FPM Supplement 293-31). 2. Government-wide medical questionnaires and confidential medical reports, except for those included in physical examinations filed in or associated with Official Personnel Folder. 3. Central and regional office pre-employment examinations, confidential medical reports, and case files of eligibles rejected for medical reasons, which are not filed in or associated with the Official Personnel Folder. 4. Treatment Slips (BRI Form 80-8, or equivalent). 5. Health Unit Treatment Record (BRI Form 80-26, or equivalent). 6. Index to medical appeals (See APP for appeals cases).	relating to both the internal and Government-wide medical program and services. See FPM Supplement 293-31 for instructions relating to medical records of employees transferred to another agency. Transfer medical records of separated employees to HPRC (CPR), St. Louis, Missouri, 30 days after separation of employee, in accordance with FPM Supplement 293-31. Break closed records annually. Destroy 2 years after break. Break closed records annually. Destroy 2 years after break. Break quarterly. Destroy 3 months after break. Break closed records annually. Destroy 6 years after break. Break indexes annually on cases which have been closed. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	PERSONNEL - CSC This grouping of records consists of documents relating to internal personnel administration. <u>Excluded</u> are matters dealing with the development and administration of Government-wide personnel management programs.	
1.	Official Personnel Folder, except papers on the left or the so-called "temporary" side of the folder, which are authorized for disposal by item 9 of this schedule. a. Folders of separated employees. b. Folders of transferred employees.	Transfer folders of separated employees to inactive file on separation in accordance with FPM, transfer folder to NPRC (CPR), St. Louis, Missouri, 30 days after separation. Destroy 75 years after birth of employee or 60 years after date of earliest document if date of birth cannot be ascertained provided the employee has been separated or retired for at least 5 years. See FPM Supplement 293-31 for instructions relating to the folders of employees transferred to another agency.
2.	Service Record Card (SF 7, or equivalent) for employees separated or transferred.	Destroy 3 years after year of employee's separation or transfer to another agency.
3.	Correspondence offering appointment to potential employees.	
	a. Acceptances.	Destroy after information is recorded.
	b. Declinations from CSC certificate of eligibles.	Return to the responsible Commission activity with certificate and related papers.
	c. Declinations of offers for temporary or excepted appointments.	Break annually. Destroy upon receipt of Commission report of evaluation or 2 years from break, whichever is earlier, providing the requirements of FPM Chapter 333, Section A-4, are observed.
4.	Eligibility certificate files maintained by personnel office.	
	a. Requests for certificates of eligibles.	Break annually. Destroy 2 years after break.
	b. Certificates of eligibles.	Break annually. Destroy 2 years after break.
5.	Employee record cards used by operating officials outside the personnel office (such as SF 7-B).	Destroy on transfer to another agency or bureau or on separation of employee.

3.PER.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
6.	Position description. a. Record copy. b. Other copies.	Destroy 5 years after position is abolished or description is superseded. Destroy after position is abolished or description is superseded.
7.	Employee interview records, including exit interviews.	Destroy 6 months after date of separation or transfer of employee.
8.	Duplicate case files of performance rating boards of review.	Break annually. Destroy 1 year after break.
9.	All copies of correspondence and forms maintained as temporary records on the left side of the Official Personnel Folder in accordance with FPM Chapter 293, and FPM Supplement 293-31.	Destroy on transfer to another agency (except in a transfer of functions), separation of employee, or when 2 years old, whichever is earlier.
10.	Position identification strips, used in service control file (such as SF 7) to provide summary data on each position occupied.	Destroy when position is cancelled or new strip prepared.
11.	Incentive Awards Case Files.	Break annually. Destroy 3 years after break.
12.	Personnel office copies of reports pertaining to the incentive awards program.	Break annually. Destroy 3 years after break.
13.	Notification of personnel action, exclusive of those filed in Official Personnel Folder and pay or fiscal copies. a. Chronological file copies, including face sheets. b. All other copies.	Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break.
14.	Applications for employment and related papers, excluding applications resulting in appointment filed in the Official Personnel Folder (covered in item 1 of this schedule).	Break annually. Destroy upon receipt of Commission report of evaluation or 2 years from break, whichever is earlier, providing the requirements of FPM Chapter 333, Section A-4, are observed.
15.	Statistical reports in the operating personnel office and subordinate units relating to personnel.	Break annually. Destroy 2 years after break.
16.	Correspondence and forms in operating personnel offices relating to individual employees not maintained in Official Personnel Folders and not provided for elsewhere in this schedule. a. Correspondence and forms relating to pending personnel actions. b. Retention registers (including card files and related papers) from which reduction-in-force actions have been taken.	Destroy when action is completed. Destroy 2 years from date of register.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	c. Retention registers (including card files and related papers) from which no reduction-in-force actions have been taken.	Destroy when superseded.
	d. All other correspondence forms.	Break every 6 months. Destroy 6 months after break.
17.	Copies of documents duplicated in Official Personnel Folders and not provided for elsewhere in this schedule.	Break every 6 months. Destroy 6 months after break.
18.	Certificates of performance rating.	Break annually. Destroy 2 years after break.
19.	Performance evaluations under merit promotion plan.	Break annually. Destroy 5 years after break.
20.	Statements of employment and financial interests and related papers.	Destroy 2 years after employee leaves a position in which a statement is required, or 2 years after the employee leaves the agency, whichever is earlier.
21.	Designation of Employee to Administer Oaths (CSC 1268, 1269, or equivalent).	Destroy when individual leaves position requiring authority.
22.	Record or request for certification or prior approval of promotion and/or reassignment (SF 59, or equivalent).	Break annually those requests acted upon. Destroy 2 years after break.
23.	Promotion certificates maintained by personnel offices.	Destroy after inspection by OMAA or when 2 years old, whichever is earlier.
24.	Regional office reports of exceptions to salary policy.	
	a. Central office copies.	Break annually. Destroy 3 years after break.
	b. Regional office copies.	Break annually. Destroy 1 year after break.
25.	Charts of positions and incumbents.	
	a. Central office copies.	Break annually. Destroy 3 years after break.
	b. Regional office copies.	Break annually. Destroy 1 year after break.
26.	Applications for leave and supporting papers, except for those required by payroll office.	Break annually. Destroy 1 year after break.
27.	Equal Employment Opportunity Case Files; consisting of cases described by 5 CFR 713.222 and resolved without appeal (See APP for cases resolved by appeal).	Break closed cases annually. Destroy 4 years after break.
28.	Adverse Action Case Files; consisting of cases developed under provisions of 5 CFR 752 and resolved without appeal (See APP for cases resolved by appeal).	Break closed cases annually. Destroy 4 years after break.
29.	Grievance Case Files; consisting of formal cases processed under provisions of 5 CFR 771 and resolved within the agency.	Break closed cases annually. Destroy 3 years after break.

3.PER.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
30.	Labor Management Agreement Files; consisting of central and regional office labor-management agreements, together with correspondence relating to employee union negotiations and the execution of agreements.	
	a. Central and regional office contract agreement files.	Break annually. Destroy 7 years after break.
	b. Central office files involving reviews of regional office contract proposals.	Break annually. Destroy 7 years after break.
31.	Case files concerning admonishments or reprimands developed in accordance with 5 CFR 751.	Destroy on transfer to another agency (except in a transfer of functions), separation of employee, or when 2 years old, whichever is earlier.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
RETIREMENT This grouping of records consists of documents relating to the administration of the civil service retirement system.		
1.	Retirement Record Case Files ("2806 Files").	Transfer to Boyers when case is closed. Disposal not authorized for lack of appropriate legislation.
2.	Closed Annuity Files (completed "2806 Files").	Transfer to Death Claim File upon closing.
3.	Closed Death Claim File.	Transfer to Boyers 1 year after final settlement of claim. Disposal not authorized for lack of appropriate legislation.
4.	Closed Annuity and Death Claim Index File.	Disposal not authorized for lack of appropriate legislation.
5.	Retirement General Index.	Disposal not authorized for lack of appropriate legislation.
6.	Statistical Annuitant File.	Disposal not authorized for lack of appropriate legislation.
7.	Register of Separations and Transfers, SF 2807, or equivalent.	Destroy after annual summarization of retirement transactions has been reconciled.
8.	Designation of Beneficiary, SF 2808, or equivalent.	Transfer to Death Claim File upon receipt.
9.	Voluntary Contribution Account Card, BRI Form 49-75, or equivalent.	Transfer to Death Claim File upon receipt of application for annuity refund or death claim.
10.	Service Credit Account Card, BRI Form 49-135, or equivalent.	Transfer to Death Claim File upon receipt of application for annuity refund or death claim.
11.	Annuity Award Correspondence File.	Break annually. Destroy 1 year after break.
12.	Retirement annuity roll questionnaires.	
	a. Report of Income, BRI Form 49-160, or equivalent.	Break annually. Destroy 3 years after break.
	b. Marital Status Card, BRI Form 49-175, or equivalent.	Break annually. Destroy 3 years after break.
13.	Report of Withholdings and Contributions, SF 2812, or equivalent.	Break annually. Destroy 3 years after break.
14.	Retirement expenditure accounting records.	
	a. General accounts ledgers showing debit and credit entries and reflecting expenditures in summary.	Break annually. Destroy 10 years after break.

3.RET.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Records used as posting and control media, subsidiary to general ledgers and not otherwise provided for in the schedule.	Break annually. Destroy 3 years after break.
15.	Voucher and Schedule of Payments for Retirement Claims, BRI Forms 49-86 and 86a, or equivalents.	Break annually. Destroy after GAO audit or 3 years after break, whichever is earlier.
16.	Disability Retirement Case Files.	Transfer to Boyers after final settlement of claim. Disposal not authorized for lack of appropriate legislation.
17.	Card indexes to disability retirement cases, BRI Form 80-1, or equivalent.	
	a. Permanent cases.	Destroy 2 years after date of final action.
	b. Temporary cases.	Destroy when applicant is deceased, converted to permanent or reaches age 59, whichever occurs first.
18.	Control index to disability retirement cases.	Destroy 1 year after case is closed
19.	Regional Disability Retirement Files maintained in connection with physical examination of applicants for disability retirement.	Destroy 1 year after date of final claim.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	SPECIAL CATEGORIES This grouping of records consists of documents relating to (1) the operation of the Executive Assignment System established by Executive Order 11315; (2) other Commission activities involving classification, qualifications, and appointment determinations for positions and persons at grades GS-16, -17, and -18, and at equivalent salary levels, except for administrative law judges and (3) activities involving authorization of excepted appointments. 1. Supergrade Correspondence Files; general correspondence between agencies and the Commission regarding actions on supergrade positions, including certificates and letters authorizing or disapproving establishment of supergrade position. 2. Supergrade position description file. a. Active files. b. Inactive files. 3. Supergrade and P.L. 80-313 Qualifications File. a. Active files. b. Inactive files. 4. Executive Inventory Record (SF 161, SF 161a, or equivalent). 5. Excepted appointments. a. Certificates and letters authorizing or disapproving appointments under Schedule A or B of the Civil Service rules or statutory provisions. b. Letter authorizing or disapproving appointments under FPM Chapter 316, Subchapter 6 (appointments without action in rare cases). 6. Files pertaining to the establishment, amendment, or revocation of Schedule A, B, and C authorities.	Break annually. Destroy 20 years after break. Transfer to inactive file when position is abolished or cancelled. Break annually. Destroy 10 years after break. Transfer to inactive file upon denial of certificate or termination of Federal service, whichever occurs first. Break annually. Destroy 5 years after break. Destroy upon death of individual. Break annually. Destroy 5 years after break. Break annually. Destroy 10 years after break. PERMANENT. Break annually. Transfer to FARC periodically. Offer to National Archives 20 years after break.

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)
U.S. Civil Service Commission

2. MAJOR SUBDIVISION
Bureau of Management Services

3. MINOR SUBDIVISION
Office Services Division

4. NAME OF PERSON WITH WHOM TO CONFER
Charles R. Chesek

5. TEL. EXT.
632-4510

6. CERTIFICATE OF AGENCY REPRESENTATIVE:

LEAVE BLANK	
DATE RECEIVED 1 APR 1977	JOB NO.
NC1-146-77-1	
NOTIFICATION TO AGENCY	
In accordance with the provisions of 44 U.S.C. 3302a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "with-drawn" in column 18.	
8-1-77	<i>Charles R. Chesek</i> (Date) Archivist of the United States

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of Authority are not needed for the business of this agency or will not be needed after the retention periods specified.

3/21/77
Date

Donald J. Riglin
Donald J. Riglin

(Signature of Agency Representative)

Director, Bureau of MGT. Services

(Title)

7 ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
1	Revised Part III of CSC Administrative Manual Supplement (AMS) 178-D, Disposition of Records that includes the following sections: Administrative Management (ADM) - p. 1 Administrative Services (ADS) - p. 5 Committee Management (COM) - p. 15 Information Services (INF) - p. 25 Personnel (CSC), (PER) - p. 37 Appeals (APP) - p. 13 ~~Classification and Compensation (CLC)~~ - Employee Development and Utilization (EDU) - p. 16 Employee Relations and Services (ERS) - p. 20 Employment (EMP) (Except item 19(c)) - p. 17 Examining and Recruitment (EXR) (Except item 5) - p. 22 Evaluations (EVL) (formerly INP) - p. 21 Insurance (INS) - p. 27 Investigations (INV) - p. 29 Medical (MED) - p. 36 Legal (LEG) - p. 34 Retirement (RET) - p. 41 Special Categories (SPC) - p. 43 Intergovernmental Personnel Programs (IPP) (New collection, not in the old AMS 178-D) - p. 32 The microfilming of nonpermanent records will be done in accordance with FPMR 101-11.507.	Attached	422 items

115-108

by CSC memo letter, 4 Aug 77, all FRC's - NCW sent to agency, NNF - NNC - 8/5/77

STANDARD FORM 115
Revised January 1973
Prescribed by General Services
Administration
FPMR (41 CFR) 101-11.4

89-630 287

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	ADMINISTRATIVE MANAGEMENT This grouping of records consists of documents relating to internal housekeeping operations covering overall policy, mission, organization and direction of the Commission including management improvement programs and documents relating to all formal rules, regulations and guides, as distinguished from records concerning specific Government-wide programs of an individual activity. 1. Organizational and Functional Files; consisting of charts, delegations of authority and special reports and studies that document the origin, administrative development and past and present organizational structure of the Commission. 2. General Correspondence Files (and related documentation). a. Central Office Policy and Procedure File; consisting of correspondence relating to the establishment of substantive Commission policies and procedures classified under a subject-numeric system and maintained in the Records Service Unit in the central office. b. Other Policy and Procedure Files; consisting of policy and procedure correspondence at bureau and staff office level maintained outside the Records Service Unit. c. Routine correspondence containing clarification or interpretation of general policies, procedures, rules, regulations and instructions. 3. Regional Office Subject Reference File, maintained in the Records Service Unit, consisting of the record set and index to all instructions from central to regional offices. 4. Agendas, minutes, summaries and reports of the Regional Directors' Conference and similar meetings or conference. a. Files maintained by office of primary responsibility for organization and arrangement of meeting or conference. b. Files maintained by individual members or by other offices. 5. Invitations, attendance reports, agendas, minutes and reports of routine or ad hoc meetings of conferences such as panels, workshops and non-project working group concerning chiefly administrative matters. 6. Issuance File, maintained in the Records Service Unit, consisting of a single record copy of documents issued under the CSC issuance system. 7. Record copy of each internal directive issued by or for the Commissioners or the head of any bureau or staff office.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. PERMANENT. Break periodically. Offer to NARS when 20 years old. PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Break annually. Destroy 3 years after break. PERMANENT. Break periodically. Offer to NARS when 20 years old. PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Destroy when superseded or obsolete. Break annually. Destroy 3 years after break. PERMANENT. Offer to NARS periodically. PERMANENT. Offer to the NARS periodically.

3.A/M.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
8.	Management Audit Case Files. a. Final report. b. Papers relating to compilation and resolution of final reports.	PERMANENT. Offer to NARS periodically. Destroy when 6 years old or upon issuance of succeeding report, whichever is earlier.
9.	Management projects. a. Record copy of each report, pamphlet, leaflet, graphic presentation or other published or processed document, and of the last manuscript report (if not processed or published) on substantive administrative and program management projects. b. Other administrative management reports covering routine evaluations and reports of general administrative operations along with selected background papers. Excluded from this group are documents under ADM 1 or ADM 8a. (1) Original reports in office receiving report. (2) Submitting office copies. c. Project working papers including source material, studies, analyses, notes, draft interim reports and related papers pertaining to project completion.	PERMANENT. Break annually. Offer to NARS when 20 years old. Break annually. Destroy 4 years after break. Break annually. Destroy 2 years after break or sooner if no longer needed for reference purposes. Destroy 6 months after final action on project report or 3 years after completion of report if no final action is taken.
10.	Project control documents showing assignment, progress and completion of projects.	Destroy 1 year after project completion.
11.	Annual Report. a. Record copy of each CSC Annual Report: b. Originals of bureau, regional and staff office submissions of Annual Report material. c. Copies of Annual Report submissions in originating offices. d. All other copies.	PERMANENT. Offer to NARS periodically. Destroy 5 years after release of annual report. Destroy 3 years after release of Annual Report. Destroy when no longer needed.
12.	Copies of management improvement reports to the Office of Management and Budget and selected background material. a. Bureau of Management Services copies. b. All other copies.	Break annually. Destroy 3 years after break or sooner if no longer needed for reference. Break annually. Destroy 1 year after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
13.	Records Disposition Files, including descriptive inventories, disposal authorizations, schedules for retirement of records and correspondence relating to revisions.	Destroy when superseded or obsolete.
14.	Statistical reports of records holdings. a. Bureau of Management Services copies. b. All other copies.	Destroy when 2 years old. Destroy when 1 year old.
15.	Reports Control Files; consisting of case files maintained for each report created, cancelled or superseded.	Destroy 2 years after report is discontinued.
16.	Forms control records. a. Forms file. (1) Record copy of each form developed by the Commission. (2) Forms files other than those maintained in 16a. (1). b. CSC Form 80, or equivalent, Forms Control Record. (1) Forms kept by central office forms management staff. (2) Forms maintained by other CSC activities. c. OSD Form 33, or equivalent, Forms Record Card, consisting of cards of the central office Publications Section for all standard, optional, bureau, division and regional forms.	PERMANENT. Transfer to inactive file when superseded or obsolete. Start new file every 5 years. Transfer to FARC 5 years after file becomes inactive. Offer to NARS 15 years after file becomes inactive. Destroy when related forms are discontinued, superseded or cancelled. Transfer to inactive file when superseded or obsolete. Destroy 2 years after transfer. Transfer to inactive file when superseded or obsolete. Destroy 2 years after transfer. Transfer to inactive file when superseded or obsolete. Destroy 5 years after transfer.
17.	Reference collections; consisting of copies of manuals, books, pamphlets, booklets, reprints, correspondence, etc. used for reference purposes.	Maintain only references that are necessary to meet the operating needs of the activity and that are referred to frequently. Maximum use should be made of formally established reference collections such as the CSC library. Keep collections updated by frequently destroying material that is superseded, obsolete or otherwise no longer of value.

3.ADH.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	Stocks of supplies such as blank forms, reprints, booklets, pamphlets and other printed or processed documents.	Limit acquisition to reasonable and usable quantities. Maintain minimum supply necessary for operating requirement. Purge frequently all superseded, obsolete or otherwise unnecessary supplies.
19.	Working papers; consisting of papers on matters in progress e. g., studies, rough drafts, revisions, schedules, notes.	Unless otherwise indicated in this schedule, working papers should normally be destroyed once final action on the matter in progress is taken.
20.	Addressee-Index File. a. Central office Master Addressee-Index copies of central office correspondence, maintained in the Records Service Unit for cross-reference purposes. (1) Copies filed by agency, region, bureau or staff office. (2) Copies filed by name of school, state government, labor union or veterans organization. (3) All other copies filed. (4) Routine replies to requests for information or publications, acknowledgements, transmittals, referrals and similar correspondence. b. All other addressee-index, chronological or reading files.	Break annually. Destroy 10 after break. Break every 2 years. Destroy 4 years after break. Break every 2 years. Destroy 2 years after break. Destroy without filing. Break annually. Destroy 1 year after break.
21.	Acknowledgements of inquiries and requests that have been referred outside the Commission for reply and letter of referral.	Break quarterly. Destroy 3 months from break or when no longer needed.
22.	Inventory of unanswered correspondence.	Break annually. Destroy 1 year from break.
23.	Indexes not covered elsewhere in this schedule.	Same as for the indexed material.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	ADMINISTRATIVE SERVICES This grouping of records consists of documents relating to administrative services, such as procurement, space management and building maintenance, property management, communications and transportation, mail and distribution, printing, etc. 1. Contract, requisition, purchase order, lease, bond and surety records, including correspondence and related papers pertaining to award, organization copy, administration, receipt, inspection, and payment. a. Transactions, after July 25, 1974, of more than \$10,000. b. Transactions, after July 25, 1974, of \$10,000 or less. c. Obligation copy (See BUDGET AND FISCAL). d. All other copies. (1) Duplicates. (2) Non-duplicates. 2. Report by Civilian Executive Agencies on Procurement. 3. Bid Files. 4. Prospective bidder card record. 5. Vendor catalogues and Federal Supply Schedules. 6. Register of purchase orders. 7. Requisitions for non-personal services, such as duplicating, laundry, binding and other services (excluding records associated with accountable officers' accounts). 8. Requisitions for supplies and equipment from current inventory. a. Stockroom copy.	Break closed cases annually. Transfer to FARC 2 years after break. Destroy 6 years after break. Break closed cases annually. Destroy 3 years after break. (BUDGET AND FISCAL). Break annually. Destroy 1 year after break. Destroy in accordance with 1a, b, c. Destroy 2 years after date of report. Destroy in accordance with the provisions of ADS item 1. Destroy when evidence shows bidder is no longer interested in bidding. Destroy as superseded. Break annually. Destroy 5 years after break. Break annually. Destroy 1 year after break. Break annually. Destroy 2 years after break.

3.ADS.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. All other copies.	Break semi-annually. Destroy 6 months after break.
9.	Inventory Files.	
	a. Inventory lists.	Destroy 2 years from date on list.
	b. Inventory cards.	Destroy 2 years after discontinuance of item or 2 years after stock balance is transferred to new card or recorded under a new classification, or 2 years after equipment is removed from agency control, whichever occurs first.
10.	Reports of supply requirements and procurement matters submitted for supply management purposes (other than those incorporated in case files or other files of a general nature).	
	a. Copies received from other units for internal purposes or for transmission to staff agencies.	Break annually. Destroy 2 years after break.
	b. Copies in other reporting units, and related work papers.	Break annually. Destroy 1 year after break.
11.	Reports of excess personal property.	Destroy 3 years after date of report.
12.	Annual report of non-expendable property.	Destroy 1 year after reconciliation with card record of inventory.
13.	Equipment maintenance record.	Destroy after annual summary of reports.
14.	Identification credentials and related papers.	
	a. Identification credentials including cards, badges, parking permits, photographs, agency permits to operate motor vehicles, and property and visitor's passes, etc.	Destroy immediately after return to issuing office.
	b. Receipts, indices, listings, and accountable records.	Destroy after all listed credentials are accounted for.
15.	Requests for building and equipment maintenance services, excluding fiscal copies	Break completed or cancelled requests quarterly. Destroy 3 months after break.
16.	Report on conservation of critical materials.	Destroy 2 years after date of report.
17.	Report on lost, damaged, destroyed or stolen property.	Destroy 2 years after date of survey action.
18.	Report on external transfer of excess property and disposal of surplus and proceeds thereof.	Destroy 3 years after date of report.
19.	Case files on sale of surplus personal property, comprising invitations, bids, acceptances, lists of materials, evidence of sales, and related correspondence.	

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	a. Transactions, after July 25, 1974, of more than \$10,000.	Break closed cases annually. Transfer to FARC 2 years after break. Destroy 6 years after break.
	b. Transactions, after July 25, 1974, of \$10,000 or less.	Break closed cases annually. Destroy 3 years after break.
	c. Obligation copy (See BUDGET AND FISCAL).	(See BUDGET AND FISCAL).
	d. All other copies.	
	(1) Duplicates.	Break annually. Destroy 1 year after break.
	(2) Non-duplicates.	Break annually. Destroy in accordance with 20a, b, c.
20.	Inventory of Non-Expendable Property; certificate of compliance.	Destroy 2 years after date of report.
21.	Authorization for removal of property or materials, Property Pass Files.	Break expired or revoked pass files quarterly. Destroy 3 months after break.
22.	Records relating to the allocation, utilization and release of space under agency control, and related reports to GSA.	
	a. Building plan files and related agency records utilized in space planning, assignment and adjustment.	Destroy 2 years after termination of assignment, or when lease is cancelled, or when plans are superseded or obsolete, whichever comes first.
	b. Correspondence with and reports to staff agencies relating to agency space holdings and requirements.	
	(1) Agency reports to GSA regarding space occupied in "Metropolitan Washington" and "Outside the District of Columbia," and related papers.	Break annually. Destroy 2 years after break.
	(2) Copies in subordinate reporting units and related work papers.	Break annually. Destroy 1 year after break.
23.	Correspondence, forms and other records relating to the compilation of directory service listings.	Destroy 2 months after issuance of listing.
24.	Regional office space reports.	Destroy 2 years after date of report.
25.	Files relating to accountability for personal property lost or stolen.	
	a. Ledger files.	Destroy 3 years after final entry.

3.ADS.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Reports, loss statements, receipts and other papers relating to lost and found articles.	Destroy 1 year from date of action.
26.	Files relating to accountability for keys issued.	For areas under maximum security, destroy 3 years after turn-in of key. For other areas, destroy 6 months after turn-in of key.
27.	Motor vehicles operating and maintenance records.	
	a. Operating records.	Break quarterly. Destroy 3 months after break.
	b. Maintenance records.	Break annually. Destroy 1 year after break.
28.	Motor vehicle ledger and work sheets providing cost and expense data.	Destroy 3 years after discontinuance of ledger or date of work sheet, whichever is sooner.
29.	Reports on motor vehicles (other than accident, operating, and maintenance reports).	Destroy 3 years after date of report.
30.	Records relating to motor vehicle accidents.	Break closed cases annually. Destroy 6 years after break.
31.	Vehicle Release Files.	Destroy 4 years after vehicle leaves agency custody.
32.	Records relating to individual employee operation of Government-owned vehicles, including driver tests, authorization to use, safe driving awards, and related correspondence.	Destroy 3 years after separation of employee or 3 years after rescission of authorization to operate Government-owned vehicle, whichever is earlier.
33.	Freight records consisting of export certificates, transit certificates, demurrage car record books, shipping documents pertinent to freight classification, memorandum copies of Government or commercial bills of lading, shortage and demurrage reports, and all supporting documents, including files relating to the shipment of household effects.	
	a. Issuing office memorandum copies of freight transactions.	Break annually. Transfer to FARC after break, if volume warrants. Destroy 3 years after break.
	b. All other copies.	Break annually. Destroy 1 year after break.
	c. Bills of lading registers.	Destroy 3 years after final entry on register.
34.	Schedules of valuables shipped and related papers and reports.	Break annually. Destroy 3 years after break.
35.	Records relating to requisitions to the Public Printer and all supporting papers.	
	a. Printing procurement unit copy of requisition, invoice, specifications and related papers.	Break completed or cancelled files annually. Destroy 4 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Accounting copy of requisition, GPO invoice, transfer of funds voucher, and receiving report.	Break settled accounts annually. Destroy 4 years after break.
36.	Job or project records containing all papers and data pertaining to the planning and execution of printing, binding, duplication and distribution jobs.	
	a. Files pertaining to the accomplishment of the job, containing requisitions, bills, samples, manuscript clearances, and related papers exclusive of (1) requisitions on the Public Printer; and (2) records relating to services obtained outside the agency.	Break files on completed jobs annually. Destroy 2 years after break.
	b. Files pertaining to planning and other technical matters.	Break annually. Destroy 3 years after break.
37.	Control registers pertaining to requisitions and work orders for printing, binding, etc.	Destroy 1 year after close of fiscal year in which compiled, or 1 year after filing of request, whichever is applicable.
38.	Mailing lists and related material.	
	a. Correspondence, request forms and other records relating to changes in mailing lists.	Destroy after revision of mailing list or after 3 months, whichever is earlier.
	b. Card lists.	Destroy individual cards when cancelled or revised.
39	Report on printing machines and equipment, procured, disposed, or repaired.	
	a. Office Services Division copy.	Destroy 3 years after date of report.
	b. Regional office copy.	Destroy 1 year after date of report.
40.	Commercial Printing Report (JCP Form #2).	
	a. Central office copy.	Destroy 3 years after date of report.
	b. All other copies.	Destroy 1 year after date of report.
41.	Acquisition of Power-Operated Collators for Use in Facilities Other Than Printing Plants (JCP Form #3).	
	a. Office Services Division copy.	Destroy 3 years after date of report.
	b. Regional office copy.	Destroy 1 year after date of report.
42.	Printing reports to Congress and related records.	
	a. Agency report to Joint Committee on Printing regarding operation of Class A and B plants and inventories of printing, binding, and related equipment in Class A and B or in storage.	Destroy 3 years from date of report.

3.ADS.06

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Copies in subordinate reporting units and related work papers.	Destroy 1 year after date of report.
43.	Stencils, plates, and mats used in reproduction including those used for duplicating test materials.	Destroy when superseded or obsolete.
44.	Mail control records including supporting and related papers.	
	a. Records of receipt and routing of incoming and outgoing mail other than (1) those listed in ADS item 49 and (2) records used as indexes to correspondence files.	Break annually. Destroy 1 year after break.
	b. Statistical reports of postage used on outgoing mail (airmail, special delivery, registered, foreign and parcel post over 4 pounds).	Break semi-annually. Destroy 6 months after break.
	c. Requisition for stamps (exclusive of copies used as supporting documents to payment vouchers).	Break semi-annually. Destroy 6 months after break.
	d. Production reports of mail handled and work performed, with compilations derived therefrom.	Break annually. Destroy 1 year after break.
	e. Records in agency mail units of remittances (check, cash, stamps, and money orders) and other valuable enclosures received through agency's mail unit in incoming mail.	Break annually. Destroy 1 year after break.
	f. Records of and receipts for mail and packages received through the Official Mail and Messenger Service.	Break semi-annually. Destroy 6 months after break.
45.	Inventory penalty material report.	Destroy 2 years after date of report.
46.	Messenger service records including daily logs, assignment records and instructions, dispatch record, delivery receipts, route schedules and related and similar records.	Break monthly. Destroy 2 months after break.
47.	Wire and wireless service control and operational records.	
	a. Machine copies of incoming and outgoing messages, message registers, operator's and equipment service logs, performance reports, daily load reports, and related papers.	Break semi-annually. Destroy 6 months after break.
	b. Teleautograph and telescribers tapes.	Destroy after message is dispatched.
	c. Original copies of outgoing messages retained by wire and wireless service.	
	(1) Authorization copy not duplicated elsewhere showing time of dispatch.	Break annually. Destroy 2 years after break.
	(2) Authorization copy duplicated elsewhere showing time of dispatch.	Break semi-annually. Destroy 6 months after break.
48.	Postal records consisting of Postal Service forms and supporting papers.	
	a. Record of received or dispatched registered mail pouch.	Break annually. Destroy 1 year after break.
	b. Application for postal registration and certificate of declared value of matter subject to postal surcharge.	Break annually. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	c. Receipt for incoming registered and insured mail.	Break annually. Destroy 1 year after break.
	d. Record of incoming and outgoing registered and insured mail.	Break annually. Destroy 1 year after break.
	e. Return receipts for registered, insured, and special delivery mail.	Break annually. Destroy 1 year after break.
	f. Report of loss rifling, delay, wrong delivery or other improper treatment of mail.	Break annually. Destroy 1 year after break.
	g. Statement of Reading Metered Registers.	Break annually. Destroy 1 year after break.
49.	Classified documents receipts, relating to the receipt or issue of classified documents.	Break annually. Destroy 2 years after break.
50.	Classified document destruction certificates, relating to the destruction of classified documents.	Break annually. Destroy 2 years after break.
51.	Classified Document Inventory Files; consisting of forms, ledgers, or registers used to show identity, internal routing, and final disposition made of classified documents, but exclusive of classified document receipts and destruction certificates and documents relating to Top Secret material covered below	Break annually. Destroy 2 years after break.
52.	Top Secret Document Accounting and Control Files.	
	a. Registers maintained at control points to indicate accountability over Top Secret documents, reflecting the receipt, dispatch, or destruction of the documents.	Destroy 5 years after documents shown on forms are downgraded, transferred, or destroyed, whichever is earlier.
	b. Forms accompanying documents to insure continuing control, showing names of persons handling the documents, intra-office routing, and comparable data.	Destroy when related document is downgraded, transferred, or destroyed, whichever is earlier.
53.	Access Request Files; consisting of requests and authorizations for individuals to have access to classified files.	Break annually. Destroy 2 years after break.
54.	Classified Document Container Security Files; consisting of forms or lists used to record safe and padlock combinations, and comparable data used to control access into classified document containers.	Destroy when superseded by a new form or list, or upon turn-in of containers, whichever is earlier.
55.	Personnel Security Clearance Status Files; maintained in security units to show the security clearance status of individuals, either in the form of lists or rosters, or as individual case files containing copies of documents contained in security case files.	Destroy lists or rosters when superseded or obsolete; destroy case files upon transfer or separation of related individual.
56.	Security Violation Files; consisting of case files relating to investigations of alleged security violations, but exclusive of files concerning felonies and papers placed in Official Personnel Folders.	Break closed cases annually. Destroy 2 years after break.
57.	Security Violation Files; consisting of case files relating to investigations of alleged security violations of a sufficiently serious nature to be classed as felonies.	Destroy 5 years after date of last action.

3.ADS.08

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
58.	Agency reports of operations tests, consisting of consolidated or comprehensive reports reflecting agency-wide results of tests conducted under emergency plans.	Destroy after next test operation.
59.	Operations Tests Files; consisting of papers accumulating from tests conducted under emergency plans, such as instructions to members participating in tests, staffing assignments, messages, tests of communications and facilities, and retained copies of reports.	Destroy 3 years after test.
60.	Correspondence files maintained by operating units responsible for administrative services pertaining to their operation and administration.	Break annually. Destroy 2 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	APPEALS This grouping of records consists of documents relating to appeal actions taken under the various laws, regulations, and rules administered by the Commission. 1. Appellate Case Files involving adverse action, reduction-in-force actions, suitability for employment, reemployment or restoration rights, discrimination, disability retirement and other decisions of the Bureau of Retirement, Insurance, and Occupational Health. Also included are hearing examiner qualifications files and ineligibility rating appeals, performance rating appeals, position classification and wage system appeals, and other miscellaneous appeals not covered elsewhere in this supplement. a. Appellate Case Files involving a minute of the Commission. b. Hearing Examiner Qualifications Files and Ineligibility Rating Appeals. (1) Active files. (2) Inactive files. c. All other case files in offices having jurisdiction over appeals. 2. Findings, recommendations and related records of discrimination complaint hearings conducted for federal agencies. 3. Recordings, stenotapes or reporters notes of transcribed hearings. 4. Control cards and other indexes to files described in item 1 above. 5. "Unsanitized" copies of field office and ARB appellate decisions forwarded to central office for review. a. "Unsanitized" copies of decisions. b. Review sheets (FEAA Form 5, or equivalent). 6. "Sanitized" copies of field office appellate decisions. a. Central office copies.	Break closed cases annually. Destroy 7 years after break. Retire to inactive files upon notice of ineligibility, determination of rating appeal, failure to update application, appointment of applicant, or applicant's reaching age of 70, whichever occurs first. Break annually. Transfer to FARC 1 year after date of break. Destroy 7 years after break. Break closed cases annually. Transfer to FARC 1 year after date of break. Destroy 7 years after break. Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break. Dispose of with related case file. Break annually. Destroy 1 year after break. Break annually. Destroy 1 year after break.

3.APP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	(1) Hard copies.	Destroy upon filming or if not filmed, break annually and destroy 20 years after break.
	(2) Microfilm copies.	Break annually. Destroy 20 years after break.
	b. Field offices.	
	(1) Hard copies	Destroy upon receipt of microfiche.
	(2) Microfiche copies	Break annually. Destroy 7 years after break.
7.	Appeals Review board (ARB) subject reference file.	Destroy individual documents when no longer needed.
8.	Reference copies of ARB decisions maintained outside ARB.	
	a. Copies relating to interpretations of rules and regulations.	Break every 3 years. Destroy 3 years after break.
	b. All other copies.	Break annually. Destroy 1 year after break.
9.	Record copy of Digest of Significant Decisions together with copies of decisions cited therein.	PERMANENT. Break annually. Transfer to FARC 10 years after break. Offer to NARS when 20 years old.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	COMMITTEE MANAGEMENT This grouping of records consists of documents relating to the organization and activity of boards, committees, councils, groups, etc. over which the Commission has administrative jurisdiction. Charters, agendas, minutes, summaries of meetings or conferences and reports of boards, committees, councils, groups, etc. over which the Commission has administrative jurisdiction, such as the Interagency Advisory Group, the Federal Prevailing Rate Advisory Committee, the Federal Employees Pay Council and the Loyalty Board. a. Files maintained by secretary of board, committee, council, group, etc. b. Files maintained by individual members.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 20 years old. Destroy when no longer needed.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYEE DEVELOPMENT AND UTILIZATION This grouping of records consists of documents relating to the Government-wide programs on employee development activities and employee incentives. 1. Incentive awards reports. a. Annual reports. b. Semi-annual reports. 2. Agency training agreements; agreement between the CSC and a Federal department or agency wherein an intensified training program is created to supplement the qualifications of individuals or trainees in an occupational series in order to expedite their meeting the requirements for promotion to higher grade positions. a. Agency-wide agreement (approved by the central office for agency-wide application). b. Regional agreements (approved by regional office for application by individual agency establishments). c. Copies of the above agreements. 3. Training program records; correspondence and reports relating to establishment of training courses and supervision of training program at Training Centers and Executive Seminar Centers (excluding correspondence and reports covering routine administrative actions and evaluations as defined in ADH). a. Office responsible for approval of training courses and supervision of training program. b. All other offices. 4. Training course records; consisting of announcements, agendas, curriculum, card registrations, rosters of participants, evaluations, billing information, and other documents related to delivery of courses.	Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break. Break expired agreements annually. Transfer to FARC 1 year after break. Destroy 6 years after break. Break expired agreements annually. Destroy 2 years after break. Break expired agreements annually. Destroy 1 year after break. PERMANENT. Break annually. Transfer to FARC 3 years after break. Offer to NARS when 20 years old. Break annually. Destroy 3 years after break. Break annually. Transfer to FARC 2 years after break. Destroy 5 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYMENT This grouping of records consists of documents relating to Government-wide employment processes such as certification of eligibles, selections, appointments, placements, transfers, conversions, etc. 1. Request for prior approval of personnel actions taken by agencies on such matters as promotion, transfer, reinstatement, change in status, etc., submitted by SF 59, CSC 648, or equivalent forms. 2. Certificate Files: Contains SF 39, SF 39A, and all papers upon which the certification was based; that is, detailed rating schedule, record of selective and quality ranking factors used, list of eligibles screened for the vacancies, ratings assigned, availability statements, and other documentation material designated by the examiner for retention. It is recommended that both the file copy and the audited report copy of the certificate be kept in this file. However they are kept, files should be arranged to permit reconstruction or validation of actions taken in the event of appeal or legal action. 3. CSC Form 3918, or equivalent, Index Control Card; certification request control index. 4. Conversion Case Files; letters and certificates pertaining to acquisition of competitive status. a. Conversion Case Files processed under FPM Chapter 315, Subchapter 7 (conversion in rare cases). b. Conversion Case Files involving minute action. c. Other Conversion Case Files. 5. Files pertaining to the establishment of term appointment authorities. 6. Displaced Employee Program (DEP) application and registration sheet. 7. DEP control cards, if maintained. 8. Files pertaining to agreements for appointment of experts and consultants. 9. Whitten Amendment Waiver Case Files.	Break annually. Destroy 1 year after break. Break annually. Destroy 5 years after break. (Files may be transferred to FARC 2 years after break). Break annually. Destroy 1 year after break. Break annually. Destroy 10 years after break. Break annually. Destroy 10 years after break. Break annually. Destroy 5 years after break. Break annually. Destroy 10 years after break. Destroy upon expiration of employee's DEP eligibility. Break annually. Destroy 2 years after break. Break expired agreements annually. Destroy 5 years after break. Break annually. Destroy 5 years after break.

3.EMP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
10.	Superior Qualification Appointment Files (payment above minimum rate).	Break annually. Destroy 5 years after break.
11.	Dual Compensation Case Files. DOD requests for appointment of military retirees who have retired less than 180 days.	
	a. Minute Cases.	Break annually. Destroy 10 years after break.
	b. Other Cases.	Destroy 3 years after action was taken.
12.	Minute case files relating to requests for waiver of reduction-in-retired-pay provisions of the Dual Compensation Act.	Break annually. Destroy 10 years after break.
13.	Case files relating to requests for exception to dual employment restrictions.	Break annually. Destroy 10 years after break.
14.	Travel and Transportation Case Files relating to transportation to first post of duty.	Break annually. Destroy 4 year after break.
15.	Files accumulated in connection with special hiring rates.	
	a. Cases of approved special hiring rates.	Break annually cases on which special hiring rates have terminated. Destroy 1 year after break.
	b. Cases of disapproved special hiring rates.	Break annually. Destroy 1 year after break.
	Employment Statistics, Reports, and Publications.	
16.	Publications Files. Printed publications and related statistical issuances produced from survey reports.	
	a. One official file copy.	PERMANENT. Transfer to FRC when 5 years old. Offer to NARS when 10 years old. (Also see ADM 9a).
	b. Other copies.	Destroy when obsolete or no longer needed for reference, whichever is sooner.
17.	Monthly Input Reports Files. Input reports required by the Commission or other Government agency from the various departments and agencies of the Federal government.	
	a. Punched cards prepared from reports.	Destroy when information on magnetic media has been verified.
	b. Hardcopy input report.	Destroy 3 years after publication.
	c. Valid transaction tapes.	Erase after third update cycle.
	d. Tabulations (printouts).	Destroy after microfilming or when no longer needed for reference, whichever is sooner.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	e. Microfilm of tabulations. <u>Annual Input Reports Files.</u> Input reports required by the Commission or other Government agency from the various departments and agencies of the Federal government. a. Punched cards prepared from reports. b. Hardcopy input report. c. Valid transactions tapes. d. Tabulations (printouts). e. Microfilm of tabulations.	Destroy when obsolete or no longer needed for reference, whichever is sooner. Destroy when information on magnetic media has been verified. Destroy after second subsequent publication is printed. Erase after third update cycle. Destroy after microfilming or when no longer needed for reference, whichever is sooner. Destroy when obsolete or no longer needed for reference, whichever is sooner.
19.	<u>Miscellaneous Input Reports Files.</u> Input reports not covered by Item 17 and 18 of this schedule. These are usually one time survey reports. a. Punched cards prepared from reports. b. Hardcopy input report. c. Reserved. d. Tabulations (printouts). e. Microfilm of tabulations.	Destroy when information on magnetic media has been verified. Destroy on termination of program. Destroy after microfilming or when no longer needed for reference, whichever is sooner. Destroy when obsolete or no longer needed for reference, whichever is sooner.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EMPLOYEE RELATIONS AND SERVICES This grouping of records consists of documents relating to the Government-wide labor-management and equal employment opportunity programs. 1. EEO affirmative action plans; plans submitted by Federal agencies to the Commission, with correspondence relating to the Commission's review of individual plans. a. Central office files. Break annually. Destroy 2 years after break. b. Regional office files. Break annually. Destroy 1 year after break. 2. Disposition reports on discrimination complaints handled and closed by Federal agencies (CSC Form 1117, or equivalent). 3. Federal agency activity reports on discrimination complaints and pre-complaint counseling. 4. EEO "Reprisal" Case Files; cases reviewed by the Commission under authority of 5 CFR 713.262b. 5. Unfair Labor Practices Case Files; consisting of complaints of unfair labor practices, responses thereto, briefs, and decisions rendered by the Assistant Secretary of Labor for Labor-Management Relations under terms of E.O. 11491 as amended. 6. Labor-management contract agreements; copies of negotiated agreements between Federal agencies and employee unions. a. Hard copies. Break annually. Destroy within 2 years after break. If not filmed, break annually and destroy 20 years after break. b. Microfilm copies. Break annually. Destroy 20 years after break. 7. Arbitration decisions; copies of arbitration decisions involving interpretation of contract agreements between Federal agencies and employee unions. a. Hard copies. Break annually. Destroy 10 years after break. If not filmed, destroy when reference purposes have been served. b. Microfilm copies. Destroy when reference purposes have been served.	

AM Supplement 44-3

Inst. 1
November 1977

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EVALUATIONS This group of records consists of documents relating to the Government-wide personnel management evaluation program.	
1.	Personnel management evaluations and special studies.	
	a. Agency-wide evaluations and special studies.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to NARS when 15 years old.
	b. All other evaluation reports and special studies.	Break annually. Destroy 10 years after break.
2.	Working papers for item 1 above.	Break annually. Destroy 4 years after break or after issuance of subsequent report, whichever is earlier.
3.	Personnel management evaluation program and Fair Labor Standards Act (FLSA) statistics.	Break annually. Destroy 7 years after break.
4.	Position Classification Advisory File; consisting of individual position classification sheets submitted by agencies and Commission's report of investigation, including certified approvals of actions furnished by agencies.	Break annually. Destroy 7 years after break.
5.	Third-party complaints of discrimination; consisting of case files relating to examination of discrimination allegations against federal agencies filed by groups or individuals not entitled to institute first-party complaints and forwarded to the Commission for review and recommendations.	
	a. Case files.	Break closed cases annually. Destroy 3 years after break.
	b. Copies of decisions maintained for public inspection.	Break annually. Destroy 5 years after break.
6.	FLSA case files; concerning requests by individual for compensation under the FLSA.	Break closed cases annually. Destroy 7 years after break.
7.	Merit System Investigation Case Files; concerning investigations of individuals for merit system abuses and the resulting report, if any.	Break closed cases annually. Destroy 7 years after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	EXAMINING AND RECRUITING This grouping of records consists of documents relating to the Government-wide examination and recruitment programs. 1. Examination Record Card File. 2. Correspondence concerning accommodations for holding examinations. 3. Correspondence relating to the shipment of examination papers and test material. 4. Stock control records of examination test material including running inventory of test material in stock. 5. Test material. a. Reserved. b. Working papers, including background material, studies, analyses notes, rough drafts, and related non-permanent papers pertaining to the development of test items. c. Processed copies of tests, rating keys, rating schedules, rating instructions, and transmutation tables, including stencils and plates used for reproduction purposes. 6. CSC Form 5000A, or equivalent, Application Record Card. 7. Designation Examination File; consisting of answer sheet, list of rating and correspondence relating to examinations given as a courtesy to members of Congress for selection of candidates to the United States military academies. 8. Examination Announcement Case Files; consisting of correspondence regarding the examination requirements, original drafts of examination and announcement issued (exclusive of correspondence, and other records concerning qualification standards, job specifications and their development). 9. Reference sets of each nation-wide, regional and local announcement maintained in central and regional offices. 10. Other processed copies of examination announcements wherever maintained for convenient reference.	Break every 3 years and transfer to FARC after break. Destroy 3 years after break. Break annually. Destroy 1 year after break. Break annually. Destroy 1 year after break. Destroy when test is superseded or obsolete. Destroy 6 months after approval of test item, or 3 years after development of test item, if not approved. Destroy when obsolete or when no longer needed. Break after examination. Destroy no later than 90 days after break. Break annually. Destroy 1 year after break. Destroy 5 years after termination of related register. Destroy 3 years after termination of related register. Destroy when obsolete or superseded.

3. EXR.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
11.	Register of eligibles; CSC Form 5001-C, or equivalent document that records eligibility of an individual for Federal jobs.	Break records on individuals with terminated eligibility annually. Transfer to FARC 1 year after break. Destroy 6 years after break.
12.	Letters to applicants denying transfer or eligibility (CSC Form 4896, or equivalent).	Break annually. Destroy 1 year after break.
13.	Notices received from eligibles indicating change in name, address, or availability.	Destroy immediately after posting.
14.	Cancelled and ineligible applications including the application, supplemental forms, and attachments submitted with the application.	Ineligible applications are usually returned to the applicant with the notice of ineligibility. Destroy ineligible applications not returned and cancelled applications 1 year after date of action or when register is terminated, whichever is sooner.
15.	Written test answer sheets for both eligibles and ineligibles.	Break annually. Destroy 1 year after break.
16.	Applications and examination papers for District of Columbia police and firemen promotion examinations.	Destroy 6 months after establishment of new register.
17.	Lost or Exposed Test Material Case Files showing the circumstances of the loss, nature of the recovery action and corrective action required.	Break closed files annually. Destroy 5 years after break.
18.	Correspondence incurred between CSC, Members of Congress, the White House, or the general public concerning applications, eligibles, certification and all other examining and recruiting operations.	Break annually. Destroy 1 year after break.
19.	Internal activity reports.	Break annually. Destroy 1 year after break, except those with statistical significance may be kept 5 years.
20.	Eligible applications.	
	a. On active register. b. On inactive register.	Destroy upon termination of the register (except applications that may be brought forward to new register, if any). Destroy 1-12 months after eligibles are placed on inactive register, depending on space availability and difficulty of replacing the application for restoration.
21.	Job Interest Cards.	Retain at least 3 months in an active status depending upon availability and volume of candidates on file. Retain inactive cards at least 6 months for responding to appeals and as back-up source.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
22.	Summer Employment Eligibles Record Card, CSC Form 918, or equivalent.	Destroy as soon as register is terminated by establishment of a new register.
23.	Alphabetical listings of summer examination eligibles.	Destroy 1 year after establishment of listing.
24.	Used test booklets.	Destroy 30 days after date of examination.
25.	Examiner Membership CSC Form 1660 or equivalent; consisting of nominations of Federal employees to serve as members, special or panel, of the area office.	Destroy individual forms upon membership termination.
26.	Area offices, Federal Job Information Centers and examination points; establishment, abolishment or change of address.	Break annually. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INFORMATION SERVICES This grouping of records consists of documents relating to the public relations and information services provided by the Commission. 1. Record set of press releases, consisting of one published copy of each release. 2. Record set of official addresses and speeches delivered by the Commissioners, Executive Director, and heads of bureaus and staff offices. 3. Information releases. a. Record copy of each report, booklet, pamphlet or other Commission information release or publication that contributes to an understanding of the organization, methods, procedures, accomplishments or functions of the Commission. b. Information releases or publications that do not furnish a substantive documentation of the Commission's activities or functions, such as check lists of publications, news digests, examination announcements, routine employee letters, etc. 4. Working papers for all documents described in 3 above including questionnaires, collections of raw data, studies, analyses, notes, rough drafts, interim reports, etc. 5. Information photographs and related indexes. a. Information photographs documenting Commission functions and programs. (1) Master negative, single captioned positive available, and number job or control cards. (2) Extra prints, proof sheets, and other materials relating to processing of requests for photograph. b. Photographs of minimal value with little documentation or historical importance, such as photographs of retirement luncheons, service award ceremonies, etc. 6. Motion pictures, video tapes and other audio-visual presentations by or for the Commission used for promotion, information or education purposes. a. For each motion picture, the original negative, a master positive and a positive print; for each video tape, the original or the earliest generation or a kine-scope; for each disc sound recording, the master tape matrix or stamper; for each magnetic audio tape, the original tape.	PERMANENT. Break annually. Offer to the NARS periodically. PERMANENT. Break annually. Offer to NARS periodically. PERMANENT. Break annually. Offer to National Archives periodically. Destroy when superseded or obsolete. Destroy 6 months after publication or 3 years after completion of final draft if document is not formally published. PERMANENT. Offer to NARS after 10 years or when no longer required for operational purposes, whichever occurs first. Destroy at time of offering permanent records to NARS, or when no longer needed for operational purposes, whichever occurs first. Destroy when no longer needed for operational purposes. PERMANENT. Offer to NARS after 10 years or when material no longer needed for operational purposes, whichever occurs first.

3. INF. 92

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Other copies.	Destroy when no longer needed for operational purposes.
7.	Finding aids and production documentation for audio visual records: existing finding aids such as data sheets, shot lists, catalogs, indexes, and other textual documentation needed for the proper identification, retrieval and use of audiovisual records, as well as production case files or similar files which include copies of contracts, scripts, transcripts or other documentation bearing on the origin, acquisition, release, or ownership of the audiovisual production.	PERMANENT. Offer to NARS with related audiovisual records.
8.	Ephemeral correspondence; consisting of incoming letters and replies thereto involving no administrative action, such as requests for information, publications, relative standing on registers, etc.	Break annually. Destroy 1 year after break.
9.	Anonymous letters, letters of commendation, complaint, criticism and suggestion, and replies thereto, excluding those on the basis of which investigations were made or administrative action taken and those incorporated in individual personnel records.	Destroy when 3 months old.
10.	Daily press service teletype news.	Destroy when 3 months old.
11.	Information services project case files maintained in formally designated information offices.	Break closed files annually. Destroy 1 year after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INSURANCE This grouping of records consists of documents relating to the administration of Federal Employee's Group Life and Health Benefits Programs.	
1.	Legal and Legislative Reference Files; maintained by office responsible for technical advice on legislative and policy matters effecting the retirement, health benefits, and life insurance programs. a. Legal Subject Files; reference material and corresponding indexes relating to documentation of precedent decisions and policy determinations effecting the retirement, health benefits, and life insurance programs, and to review cases forwarded to the Appeals Review Board. b. Legislative Subject Files; reference material and corresponding indexes relating to proposed and enacted legislation effecting the retirement, health benefits, and life insurance programs.	relating to the Insurance Break every 5 years or earlier, if volume warrants. Transfer to FARC 15 years after break or when administrative use has ceased, whichever occurs first. Destroy when 25 years old. Break by term of Congress. Transfer to FARC 15 years after break or when administrative use has ceased, whichever occurs first. Destroy when 25 years old.
2.	Health Benefits and Life Insurance Contract Files; consisting of copies of official agreements with carriers for Federal employee health benefits and life insurance plans, together with correspondence and other documentation relating to the negotiation and interpretation of rates and benefits.	
	a. Office responsible for negotiation of agreements with carriers.	PERMANENT. Break completed contracts annually. Ten years after break: (1) Destroy portion of files relating to compilation of Federal employee brochure, and (2) transfer remainder of files to FARC. Offer to NARS when 20 years old.
	b. Other offices.	Break completed contracts annually. Destroy 3 years after break.
3.	Official contracts; record copy of agreements with carriers for Federal employee health benefits and life insurance plans.	Break signed contracts annually. Transfer to Boyers after break. Destroy 20 years after break.
4.	Claims correspondence; correspondence with individuals or carriers representatives on interpretation of contracts and settlement of Federal employee claims under health benefits and life insurance plans.	
	a. Correspondence on routine contract problems and contract interpretations.	Break annually. Destroy 4 years after break.
	b. Correspondence on non-routine contract interpretations or unusual claims problems.	Break annually. Destroy 5 years after break or when administrative needs have been served, whichever occurs first.

3.INS.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
5.	Constitutions and bylaws of Federal employee organizations.	Destroy when superseded or obsolete.
6.	Accounting statements.	Break annually. Transfer to Boyers 5 years after break. Destroy 20 years after break.
	a. Instructions to carriers regarding preparation of accounting statements with related documentation.	Break annually. Transfer to Boyers 5 years after break. Destroy 20 years after break.
	b. Carrier reports; interim and annual accounting statements of health benefits carriers, together with documents relating to analyses of carrier reports.	Break annually. Destroy 20 years after break or when updated or obsolete, whichever occurs first.
7.	Financial schedules; forms and charts summarizing fiscal operations of life insurance, health benefits, and retirement programs.	Break closed files annually. Transfer to FARC 3 years after break. Destroy 10 years after break.
8.	Audit reports of health benefits and life insurance carriers, and backup documents together with correspondence relating to resolution of findings.	Break annually. Destroy 3 months after break.
9.	Correspondence relating to conduct of audits.	Destroy after filming. If not filmed, break annually and destroy 30 years after break or when administrative needs have been served, whichever occurs first.
10.	Utilization reports on health benefits programs; consisting of statistical analyses used for the conduct of actuarial studies and derived from carrier reports on operations of health benefits programs:	Break annually. Destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	a. Hard copies.	Destroy after filming. If not filmed, break annually and destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	b. Microfilm copies.	Break annually. Destroy 30 years after break or when administrative needs have been served, whichever occurs first.
11.	Statistical reports and annuitant evaluations of retirement and life insurance programs; consisting of statistical analyses used for the conduct of actuarial studies and based on the operation and projected costs of retirement and life insurance programs.	Destroy after filming. If not filmed, break annually and destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	a. Hard copies.	Break annually. Destroy 30 years after break or when administrative needs have been served, whichever occurs first.
	b. Microfilm copies.	Destroy when accuracy of summary pages has been determined.
	c. Auxiliary tabulations.	

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INVESTIGATIONS	
	This grouping of records consists of documents relating to the Government-wide investigative program.	
1.	Investigative Case Files. a. Record copies of reports and related papers maintained in the Bureau of Personnel Investigations (BPI). b. Copies of reports, related papers, and investigator notes retained in Regional Investigations Division (RID). (1) Copies of region of origin cases. (2) Copies of participating region cases. (3) Copies of spot checks, personal confidential inquiries, and personal record searches. (4) Copies of political activity, and other special types of investigative cases. c. Bar and Flag Files, excluding medical flags. (1) Record copies of closed cases resulting in debarment or flagging. (2) Regional office copies of closed cases which result in debarment or flagging.	Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old. Break closed cases every 3 months. Destroy 3 months after break.
2.	National Agency Check and Inquiry Case Files; includes inquiry forms, results of National Agency Checks, and related case papers. a. Files marked "Clear - file retained in region for destruction" under instructions in FPM Supplement 736-72 (Internal). b. Files marked "File to BPI" under instructions in FPM Supplement 736-72 (Internal).	Break closed cases monthly. Destroy 2 months after break. Break closed cases annually. Transfer to WNRC 5 years after break. Destroy when 20 years old.
3.	Security Investigations Index (SII), central office index to personnel investigations.	"When an investigation file is not maintained, remove from active files 2 years from date of final action and put in "Disclosure Accounting" file for additional 5 years, then destroy. Remove all other cards from active files 20 years after the date of final action and destroy.

3.21V.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. a. Central Office (BPI)	Break closed cards annually. Destroy 2 years after break.
	b. Washington Division of Investigations (WDI) and RID.	Break closed cards semi-annually. Destroy 6 months after break.
5.	Desk Case Control File; card record of pending cases maintained by deadline date in BPI, WDI and RID.	Destroy when case is closed.
6.	Investigations Security Reference File.	Destroy upon completion of program.
7.	Loyalty Conversion to FBI and Record of Processing FBI Investigation File (In Form 131, or equivalent).	Break annually. Destroy 2 years after break.
8.	Regional office evaluation reports.	Break annually. Destroy 5 years after break.
9.	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
10.	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
11.	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of CSC investigative file, or destroyed if investigative file belongs to another agency.
12.	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
13.	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
14.	Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FPM Supplement (Internal) 736-72.	Break annually. Destroy 3 years after break.
15.	CSC Form 2799, or equivalent, Daily Report of Investigator.	Break quarterly. Destroy no later than one year after break.
16.	Security program workload report.	Break annually. Destroy 1 year after break.
17.	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 1
November 1977

AMI Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
18.	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
19.	Relocation File; folders containing duplicate information relating to personnel investigation and adjudications which warrant retention at a relocation site for use in the event of a national emergency.	Transfer to relocation site when sufficient number available.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INTERGOVERNMENTAL PERSONNEL PROGRAMS This grouping of records consists of documents relating to the implementation of the Intergovernmental Personnel Act. 1. Grant-in-Aid Case Files (funded and unfunded); consisting of approved applications for assistance, including but not limited to evaluations, press releases, narrative statements, fiscal and budget information, monitoring reports, final reports, impact assessments and related documents. a. Cases maintained by the office which provides grants management. b. Information copies maintained by all other offices. c. Rejected grant applications. 2. Grant products; information copies of publications, films, slides, and comparable items prepared as a result of the grant but not part of the grant file. 3. State Plan Files; consisting of laws, rules, regulations job classifications and comparable material received from state and local governments relating to merit systems. 4. State program correspondence and related documents accumulated in monitoring merit systems at the state and local levels. 5. Technical assistance agreements and products maintained by the managing office. a. Reimbursable agreements. b. Non-reimbursable agreements. 6. Technical assistance agreements and products maintained by other offices. 7. Survey, study, and project files relating to quantitative or qualitative reviews on merit systems, salary, equal employment and comparable areas of responsibility.	Break terminated grants annually. Destroy 5 years after break or after audit by GAO, whichever is earlier. Break copies pertaining to terminated grants annually. Destroy 2 years after break or when no longer needed for reference, whichever is earlier. Break annually. Destroy 2 years after break. Destroy when superseded or obsolete. Destroy when superseded or obsolete. Break every 3 years and transfer to FARC. Destroy 3 years after break. Break terminated agreements annually. Destroy 5 years after break or after audited by GAO, whichever is earlier. Break terminated agreements annually. Destroy 2 years after break. Break terminated agreements annually. Destroy 2 years after break or when no longer needed for reference, whichever is earlier.

3.IPP.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	a. Published or unpublished final report.	PERMANENT. Break annually, offer to NARS in 3 year blocks when 5 years old.
	b. Background materials maintained relating to item 7a.	Destroy when superseded or obsolete or after publication of report, whichever is earlier.
	c. Feeder reports.	Destroy after publication of report or 2 years after submission of report, whichever is earlier.
8.	Assignment agreements between Federal Government and State and local governments relating to the interchange or assignment of personnel in the mobility program.	
	a. Records maintained by the approving office.	Break closed agreements annually. Destroy 5 years after break.
	b. All other copies.	Break closed agreements annually. Destroy 1 year after break.
9.	Promotional materials relating to the mobility program.	Break every 2 years. Destroy 1 year after break.
10.	Cards containing information on assignment agreements used in preparing reports.	Destroy when superseded or obsolete.
11.	Statistical reports relating to assignments under the mobility program.	Break annually. Destroy 5 years after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	LEGAL	
	This grouping of records consists of documents relating to legal services provided for CSC activities and the Commission's participation in the Voting Rights program.	
1.	Political Activity (Hatch Act) Case Files.	
	a. Basic case file; consisting of letters of charges, hearing reports, and notices of action taken.	Break closed cases annually. Transfer to FARC 1 year after break. Destroy 7 years after break.
	b. Reference copies filed by subject in the Office of the General Counsel.	Break closed cases annually. Destroy 3 years after break.
	c. All other reference copies.	Break copies on closed cases annually. Destroy 1 year after break.
2.	Files on court cases. (See ADS 30 for tort claims).	Break closed case annually. Transfer to FARC 1 year after break. Destroy 7 years after break.
3.	Legislative Bill Files.	
	a. Correspondence, reports, and documentation relating to establishment of Commission position on legislative proposals.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to National Archives when 15 years old.
	b. Copies of proposed legislation maintained for informational purposes.	Destroy immediately upon adjournment of related session of congress.
4.	Voting Rights Program Records.	
	a. Eligibility lists and challenge files.	Transfer to FARC after date of election for which prepared. Destroy 75 years after date of election for which prepared.
	b. Voter applications and copies of registration certificates.	Transfer to FARC after date of election for which prepared. Destroy 15 years after date of election for which prepared.
	c. Examiner reports on voting rights activity and voting rights applicants.	
	1. Central office copies.	Break quarterly and transfer to records staging area. Destroy 2 years after break.
	2. Regional office copies.	Destroy 1 year after date of election for which prepared.
	d. Observer reports.	

3.LEG.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	1. Central office copies.	Break quarterly and transfer to records staging area. Transfer to the Department of Justice 2 years after break.
	2. Regional office copies.	Break quarterly. Destroy 3 months after break.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	MEDICAL This grouping of records consists of documents relating to both the internal and Government-wide medical program and services.	
1.	Government-wide pre-employment, periodic requalification, and fitness for duty physical examinations (SF 78, or equivalent) filed in or associated with Official Personnel Folder. (Maintain in accordance with FPM Supplement 293-31).	See FPM Supplement 293-31 for instructions relating to medical records of employees transferred to another agency. Transfer medical records of separated employees to HPRC (CPR), St. Louis, Missouri, 30 days after separation of employee, in accordance with FPM Supplement 293-31.
2.	Government-wide medical questionnaires and confidential medical reports, except for those included in physical examinations filed in or associated with Official Personnel Folder.	Break closed records annually. Destroy 2 years after break.
3.	Central and regional office pre-employment examinations, confidential medical reports, and case files of eligibles rejected for medical reasons, which are not filed in or associated with the Official Personnel Folder.	Break closed records annually. Destroy 2 years after break.
4.	Treatment Slips (BRI Form 80-8, or equivalent).	Break quarterly. Destroy 3 months after break.
5.	Health Unit Treatment Record (BRI Form 80-26, or equivalent).	Break closed records annually. Destroy 6 years after break.
6.	Index to medical appeals (See APP for appeals cases).	Break indexes annually on cases which have been closed. Destroy 1 year after break.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	PERSONNEL - CSC This grouping of records consists of documents relating to internal personnel administration. Excluded are matters dealing with the development and administration of Government-wide personnel management programs.	
1.	Official Personnel Folder, except papers on the left or the so-called "temporary" side of the folder, which are authorized for disposal by item 9 of this schedule. a. Folders of separated employees. b. Folders of transferred employees.	Transfer folders of separated employees to inactive file on separation in accordance with FPM, transfer folder to NPRC (CPR), St. Louis, Missouri, 30 days after separation. Destroy 75 years after birth of employee or 60 years after date of earliest document if date of birth cannot be ascertained provided the employee has been separated or retired for at least 5 years. See FPM Supplement 293-31 for instructions relating to the folders of employees transferred to another agency.
2.	Service Record Card (SF 7, or equivalent) for employees separated or transferred.	Destroy 3 years after year of employee's separation or transfer to another agency.
3.	Correspondence offering appointment to potential employees.	
	a. Acceptances.	Destroy after information is recorded.
	b. Declinations from CSC certificate of eligibles.	Return to the responsible Commission activity with certificate and related papers.
	c. Declinations of offers for temporary or excepted appointments.	Break annually. Destroy upon receipt of Commission report of evaluation or 2 years from break, whichever is earlier, providing the requirements of FPM Chapter 333, Section A-4, are observed.
4.	Eligibility certificate files maintained by personnel office.	
	a. Requests for certificates of eligibles.	Break annually. Destroy 2 years after break.
	b. Certificates of eligibles.	Break annually. Destroy 2 years after break.
5.	Employee record cards used by operating officials outside the personnel office (such as SF 7-B).	Destroy on transfer to another agency or bureau or on separation of employee.

3, PER.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
6.	Position description. a. Record copy. b. Other copies.	Destroy 5 years after position is abolished or description is superseded. Destroy after position is abolished or description is superseded.
7.	Employee interview records, including exit interviews.	Destroy 6 months after date of separation or transfer of employee.
8.	Duplicate case files of performance rating boards of review.	Break annually. Destroy 1 year after break.
9.	All copies of correspondence and forms maintained as temporary records on the left side of the Official Personnel Folder in accordance with FPM Chapter 293, and FPM Supplement 293-31.	Destroy on transfer to another agency (except in a transfer of functions), separation of employee, or when 2 years old, whichever is earlier.
10.	Position identification strips, used in service control file (such as SF 7) to provide summary data on each position occupied.	Destroy when position is cancelled or new strip prepared.
11.	Incentive Awards Case Files.	Break annually. Destroy 3 years after break.
12.	Personnel office copies of reports pertaining to the incentive awards program.	Break annually. Destroy 3 years after break.
13.	Notification of personnel action, exclusive of those filed in Official Personnel Folder and pay or fiscal copies. a. Chronological file copies, including face sheets. b. All other copies.	Break annually. Destroy 2 years after break. Break annually. Destroy 1 year after break.
14.	Applications for employment and related papers, excluding applications resulting in appointment filed in the Official Personnel Folder (covered in item 1 of this schedule).	Break annually. Destroy upon receipt of Commission report of evaluation or 2 years from break, whichever is earlier, providing the requirements of FPM Chapter 333, Section A-4, are observed.
15.	Statistical reports in the operating personnel office and subordinate units relating to personnel.	Break annually. Destroy 2 years after break.
16.	Correspondence and forms in operating personnel offices relating to individual employees not maintained in Official Personnel Folders and not provided for elsewhere in this schedule. a. Correspondence and forms relating to pending personnel actions. b. Retention registers (including card files and related papers) from which reduction-in-force actions have been taken.	Destroy when action is completed. Destroy 2 years from date of register.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	c. Retention registers (including card files and related papers) from which no reduction-in-force actions have been taken.	Destroy when superseded.
	d. All other correspondence forms.	Break every 6 months. Destroy 6 months after break.
17.	Copies of documents duplicated in Official Personnel Folders and not provided for elsewhere in this schedule.	Break every 6 months. Destroy 6 months after break.
18.	Certificates of performance rating.	Break annually. Destroy 2 years after break.
19.	Performance evaluations under merit promotion plan.	Break annually. Destroy 5 years after break.
20.	Statements of employment and financial interests and related papers.	Destroy 2 years after employee leaves a position in which a statement is required, or 2 years after the employee leaves the agency, whichever is earlier.
21.	Designation of Employee to Administer Oaths (CSC 1268, 1269, or equivalent).	Destroy when individual leaves position requiring authority.
22.	Record or request for certification or prior approval of promotion and/or reassignment (SF 59, or equivalent).	Break annually those requests acted upon. Destroy 2 years after break.
23.	Promotion certificates maintained by personnel offices.	Destroy after inspection by OMAA or when 2 years old, whichever is earlier.
24.	Regional office reports of exceptions to salary policy.	
	a. Central office copies.	Break annually. Destroy 3 years after break.
	b. Regional office copies.	Break annually. Destroy 1 year after break.
25.	Charts of positions and incumbents.	
	a. Central office copies.	Break annually. Destroy 3 years after break.
	b. Regional office copies.	Break annually. Destroy 1 year after break.
26.	Applications for leave and supporting papers, except for those required by payroll office.	Break annually. Destroy 1 year after break.
27.	Equal Employment Opportunity Case Files; consisting of cases described by 5 CFR 713.222 and resolved without appeal (See APP for cases resolved by appeal).	Break closed cases annually. Destroy 4 years after break.
28.	Adverse Action Case Files; consisting of cases developed under provisions of 5 CFR 752 and resolved without appeal (See APP for cases resolved by appeal).	Break closed cases annually. Destroy 4 years after break.
29.	Grievance Case Files; consisting of formal cases processed under provisions of 5 CFR 771 and resolved within the agency.	Break closed cases annually. Destroy 3 years after break.

3.PER.04

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
30.	Labor Management Agreement Files; consisting of central and regional office labor-management agreements, together with correspondence relating to employee union negotiations and the execution of agreements. a. Central and regional office contract agreement files. b. Central office files involving reviews of regional office contract proposals.	Break annually. Destroy 7 years after break. Break annually. Destroy 7 years after break.
31.	Case files concerning admonishments or reprimands developed in accordance with 5 CFR 751.	Destroy on transfer to another agency (except in a transfer of functions), separation of employee, or when 2 years old, whichever is earlier.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
RETIREMENT This grouping of records consists of documents relating to the administration of the civil service retirement system.		
1.	Retirement Record Case Files ("2806 Files").	Transfer to Boyers when case is closed. Disposal not authorized for lack of appropriate legislation.
2.	Closed Annuity Files (completed "2806 Files").	Transfer to Death Claim File upon closing.
3.	Closed Death Claim File.	Transfer to Boyers 1 year after final settlement of claim. Disposal not authorized for lack of appropriate legislation.
4.	Closed Annuity and Death Claim Index File.	Disposal not authorized for lack of appropriate legislation.
5.	Retirement General Index.	Disposal not authorized for lack of appropriate legislation.
6.	Statistical Annuitant File.	Disposal not authorized for lack of appropriate legislation.
7.	Register of Separations and Transfers, SF 2807, or equivalent.	Destroy after annual summarization of retirement transactions has been reconciled.
8.	Designation of Beneficiary, SF 2808, or equivalent.	Transfer to Death Claim File upon receipt.
9.	Voluntary Contribution Account Card, BRI Form 49-75, or equivalent.	Transfer to Death Claim File upon receipt of application for annuity refund or death claim.
10.	Service Credit Account Card, BRI Form 49-135, or equivalent.	Transfer to Death Claim File upon receipt of application for annuity refund or death claim.
11.	Annuity Award Correspondence File.	Break annually. Destroy 1 year after break.
12.	Retirement annuity roll questionnaires.	
	a. Report of Income, BRI Form 49-160, or equivalent.	Break annually. Destroy 3 years after break.
	b. Marital Status Card, BRI Form 49-175, or equivalent.	Break annually. Destroy 3 years after break.
13.	Report of withholdings and Contributions, SF 2812, or equivalent.	Break annually. Destroy 3 years after break.
14.	Retirement expenditure accounting records.	
	a. General accounts ledgers showing debit and credit entries and reflecting expenditures in summary.	Break annually. Destroy 10 years after break.

3.RET.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	b. Records used as posting and control media, subsidiary to general ledgers and not otherwise provided for in the schedule.	Break annually. Destroy 3 years after break.
15.	Voucher and Schedule of Payments for Retirement Claims, BRI Forms 49-86 and 86a, or equivalents.	Break annually. Destroy after GAO audit or 3 years after break, whichever is earlier.
16.	Disability Retirement Case Files.	Transfer to Boyers after final settlement of claim. Disposal not authorized for lack of appropriate legislation.
17.	Card indexes to disability retirement cases, BRI Form 80-1, or equivalent.	
	a. Permanent cases.	Destroy 2 years after date of final action.
	b. Temporary cases.	Destroy when applicant is deceased, converted to permanent or reaches age 59, whichever occurs first.
18.	Control index to disability retirement cases.	Destroy 1 year after case is closed.
19.	Regional Disability Retirement Files maintained in connection with physical examination of applicants for disability retirement.	Destroy 1 year after date of final claim.

Inst. 1
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
SPECIAL CATEGORIES		
	This grouping of records consists of documents relating to (1) the operation of the Executive Assignment System established by Executive Order 11315; (2) other Commission activities involving classification, qualifications, and appointment determinations for positions and persons at grades GS-16, -17, and -18, and at equivalent salary levels, except for administrative law judges and (3) activities involving authorization of excepted appointments.	
1.	Supergrade Correspondence Files; general correspondence between agencies and the Commission regarding actions on supergrade positions, including certificates and letters authorizing or disapproving establishment of supergrade position.	Break annually. Destroy 20 years after break.
2.	Supergrade position description file.	
	a. Active files.	Transfer to inactive file when position is abolished or cancelled.
	b. Inactive files.	Break annually. Destroy 10 years after break.
3.	Supergrade and P.L. 80-313 Qualifications File.	
	a. Active files.	Transfer to inactive file upon denial of certificate or termination of Federal service, whichever occurs first.
	b. Inactive files.	Break annually. Destroy 5 years after break.
4.	Executive Inventory Record (SF 161, SF 161a, or equivalent).	Destroy upon death of individual.
5.	Excepted appointments.	
	a. Certificates and letters authorizing or disapproving appointments under Schedule A or B of the Civil Service rules or statutory provisions.	Break annually. Destroy 5 years after break.
	b. Letter authorizing or disapproving appointments under FPM Chapter 316, Subchapter 6 (appointments without action in rare cases).	Break annually. Destroy 10 years after break.
6.	Files pertaining to the establishment, amendment, or revocation of Schedule A, B, and C authorities.	PERMANENT. Break annually. Transfer to FARC periodically. Offer to National Archives 20 years after break.

APPRAISAL REPORT ON DISPOSITION OF RECORDS	DATE	JOB NUMBER
	June 29, 1977	101-116-77-1

SECTION I - APPROVED FOR DISPOSAL

ITEM(S) FOR WHICH DISPOSAL AUTHORITY IS REQUESTED, IS (ARE) DISPOSABLE BECAUSE IT DOES (THEY DO) NOT HAVE SUFFICIENT VALUE FOR PURPOSES OF HISTORICAL OR OTHER RESEARCH, FUNCTIONAL DOCUMENTATION, OR THE PROTECTION OF INDIVIDUAL RIGHTS TO WARRANT PERMANENT RETENTION BY THE FEDERAL GOVERNMENT.

All items showing "Destroy" under disposition.

GENERAL ACCOUNTING OFFICE CONCURRENCE

N/A

☐ SEE COMMENTS OR ATTACHED LETTER.

SECTION II - APPROVED FOR PERMANENT RETENTION

ITEM(S) THAT IS (ARE) APPROVED FOR PERMANENT RETENTION, FOR THE REASONS INDICATED IN SECTION VII. THE AGENCY WILL OFFER THESE RECORDS TO THE NATIONAL ARCHIVES AND RECORDS SERVICE AS SPECIFIED IN THE SCHEDULE.

All items showing "PERMANENT" under disposition.

SECTION III - APPROVED FOR DISPOSAL AFTER CONVERSION TO MICROFORM

ITEM(S) FOR WHICH DISPOSAL AUTHORITY IS REQUESTED, IS (ARE) DISPOSABLE BECAUSE THE RETAINED MICROFORM IS AN ADEQUATE SUBSTITUTE FOR THE ORIGINAL RECORDS. THE AGENCY CERTIFIES COMPLIANCE WITH THE STANDARDS SET FORTH IN FPMR 101-11.504.

APP-6, ERS-6, ERS-7, DNS-10, and INS-11 will be microfilmed in accordance with FPMR 101-11.507, Standards for microfilming nonpermanent records.

SECTION IV - DISPOSAL NOT APPROVED

ITEM(S) THAT IS (ARE) NOT APPROVED FOR DISPOSAL AT THIS TIME. THE AGENCY WILL RESUBMIT THIS (THESE) ITEM(S) WHEN SUFFICIENT INFORMATION IS AVAILABLE TO DETERMINE THE VALUE OF THESE RECORDS FOR AGENCY AND ARCHIVAL PURPOSES. IF NOT RESUBMITTED WITHIN SIX MONTHS NARS WILL CONTACT THE AGENCY.

PST-1, RET-3, RET-4, RET-5, and RET-6.

SECTION V - WITHDRAWN

ITEM(S) THAT HAS (HAVE) BEEN WITHDRAWN AT THE REQUEST OF THE AGENCY.

SIGNATURE OF APPRAISER	<i>Ronald H. Hise</i>	DATE	<i>29 Jun 77</i>
SECTION VII - APPROVAL CONCURRENCES			
APPROVAL	<i>[Signature]</i>	DATE	<i>7/1/77</i>
	Director, Audiovisual Archives Division	DATE	<i>7/5/77</i>
CONCURRENCES	<i>[Signature]</i>	DATE	<i>JUL 28 1977</i>
	Director, Machine-Readable Archives Division	DATE	<i>8-1-77</i>
	<i>Jane F. Smith, Director NARS</i>		
SECTION VII - APPRAISER'S RECOMMENDATION			

COMMENTS:
The Civil Service Commission is the central personnel agency of the executive branch of the Federal government. As the records designated for permanent retention in this schedule document most of the functions and activities of the Commission, they are valuable for historical and other research purposes. Records relating to the classification of positions and the compensation of Federal employees and to the Commission's automatic data processing programs are not included in this schedule. These records will be covered by schedules that will be submitted to NARS for approval later this year.



UNITED STATES CIVIL SERVICE COMMISSION
WASHINGTON, D.C. 20415

IN REPLY PLEASE REFER TO

ADM 5-7-2
YOUR REFERENCE

31 MAR 1977

Mr. Thomas W. Wadlow, Director
Records Disposition Division
National Archives and Records Service
Washington, D.C. 20408

Dear Mr. Wadlow:

Enclosed is a SF 115 and a copy of our revised records control schedule for review and approval by NARS. This revision is the product of the combined efforts of members of your staff and those of our Records Administration Section.

Approval of the schedule by NARS will in no way effect the current freeze we have on the disposition of Conversion Case Files, Non-competitive Action Case Files, and Certificate Request and Report Files. The moratorium on the disposition of these records will remain in effect. In the future, there may also be occasions when we will have to suspend the disposition of certain records at the request of various investigative proceedings. When these occasions arise, I will notify you, in writing, of those records on which disposition is suspended and the period of time involved, if it can be determined.

If you have any questions concerning the revised schedule, please contact Charles R. Cheseck, Chief, Records Administration Section.

Sincerely yours,

Donald J. Biglin, Director
Bureau of Management Services

THE MERIT SYSTEM—A GOOD INVESTMENT IN GOOD GOVERNMENT

August 4, 1977

Mr. Donald J. Biglin
Director, Bureau of Management Services
U.S. Civil Service Commission
1900 E Street, N.W.
Washington, DC 20415

Dear Mr. Biglin:

We are pleased to enclose the agency copy of the approved Standard Form 115, Request for Records Disposition Authority (Job No. NCI-146-77-1). This schedule covers the disposition of most of the records of the U.S. Civil Service Commission.

As you may know, we were unable to reach agreement with the Commission on the disposition of the records relating to classification and compensation (CLC) and the background records to the test materials (EXR-5). As a result, these records are excluded from coverage at this schedule. We will continue to work with the Commission to establish acceptable disposition standards for these records. This should be done before the end of the year.

I am very grateful for the cooperation and assistance that my staff received from Charles Cheseck, Chief, Records Administrative Section. His efforts greatly assisted us in the completion of this project.

Should you have any questions about this schedule, please call Ron Heise (724-1698) or Henry Wolfinger (724-1060) of my staff.

Sincerely,

THOMAS W. WADLOW
Director
Records Disposition Division

Enclosure

OFFICIAL FILE:NC
DAY FILE:NC
cc: Job No. NCI-146-77-1

RHEISE:lp:8/4/77

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

DATE: July 29, 1977

National Archives and Records Service
Washington, DC 20408REPLY TO
ATTN OF: NNR

SUBJECT: Disposition Job NCI-146-77-1

TO: NN

At your request I reviewed NNR's involvement in this job and met with Tom Wadlow and Ron Heise to discuss the latter's comments in the appraisal report and his memo to NCD dated June 27, 1977.

My letter of January 14, 1977 to Mr. Charles Chesek of the Civil Service Commission notifying him that the machine-readable records listed on the inventory submitted to NNR were disposable under GRS #20 and therefore need not be listed on a SF 115 still stands. Unfortunately, there was some confusion about the additional work I agreed to do for Mr. Chesek. This detailed statement keying the inventory items to GRS #20 was never intended to be part of a SF 115.

Tom Wadlow and Ron Heise agree that my letter to Mr. Chesek adequately documents the disposition of the machine-readable records. The machine-readable records have not been withdrawn from the schedule because they were judged to be disposable and need not be listed on the SF 115. Contrary to NCD's memo NNR has no plans to draft a SF 115 for machine-readable records that will be submitted at a later date.

CHARLES M. DOLLAR
Director
Machine-Readable Archives Division



Keep Freedom in Your Future With U.S. Savings Bonds

GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICES		PAGE
INTRASERVICE MEMORANDUM AND ENDORSEMENT		OF PAGES
SUBJECT OR TRANSACTION NCI-146-77-1 (U.S. Civil Service Commission)		
FROM	TO	DATE AND MESSAGE
NNF	NN	7-15-77. On July 5, 1977 the attached CSC schedule was received in NNF for signature and forwarding to N.
		I have not yet signed the job because it was necessary (1) to review the new items that have been added to the schedule since our previous review and (2) to determine to what extent the Commission and NCD had made the changes requested by NNF. As Mary Walton Livingston has noted in her attached comments, many but not all of these changes have been made. For example, the schedule has retained as "permanent" the Commission's legislative history files. As you know, I feel strongly that we cannot afford to keep these voluminous files at two or three different levels and that a government-wide study of the problem is long overdue, but I will not hold up the job at this late date in an effort to have the appraisal changed.
		I am referring the schedule to you again primarily because you stated clearly in your memorandum of 9-22-76 to NNF that "NNF should withhold its approval <u>of this job</u> until the NNR portion is completed". Please note Heise's statement in his memorandum of 6-27-77 to the Director NCD, that "the scheduling of the ADP records has not been completed" and the reasons for the delay. In the light of Heise's statement, do you wish me to approve the textual portion of the schedule at this time?
		<i>Jane F. Smith</i>
		JANE F. SMITH
		Director
		Civil Archives Division

(Over)

GSA FORM 67 6702

July 13, 1977

TO: NNF/NNFL

FROM: Mary Walton Livingston

Subject: Schedule NCI-146-77-1, U. S. Civil Service Commission

The schedule is a functional description of the Commission's records. It does not include records relating to Classification and Compensation and records of the Commission's automatic data processing programs. Schedules on these two portions will be submitted to NARS later this year.

The draft schedule comprised approximately 413 items. With the elimination of those on Classification and Compensation, it now contains approximately 403 items.

The schedule was received in draft form by NNF in May, 1976, and returned to NCD, with comments, June 2, 1976. After further discussion and comment both by NCD and NNF, NNF gave general approval to the schedule in September 22, 1976. NNF received the final version in July, 1977.

In reviewing the final version, it is good to note that the Commission and NCD made some of the changes requested by NNF. The main changes are as follows.

Procurement files (ADM. SERVICES, items 2,21), were made disposable.

Labor-management agreement files of the Commission (PERSONNEL-CSC, items 30a, 30b), were made disposable.

Background papers on administrative issuances (ADM. MANGT., items 6, 7, 9a, 11a, 16a), were made disposable.

Management Audit Case Files (ADM. MANGT., item 8a), will be permanent but will be limited to record copies.

The Commission and NCD retained ^{as} permanent certain items that NNF had questioned, namely life insurance contracts that are Government-wide, (INSURANCE, 2a), agency-wide personnel evaluations (EVALUATIONS, 1a), and legislative history files (LEGAL, 3a). The justification for the first two was entirely satisfactory, but that for legislative histories was based only on past practice ^{Heise-} (Wolfinger memo to NNF, July 14, 1976). Since the summer of 1976, NNF and NCD have in at least one instance — General Counsel of the Treasury Department — agreed that legislative history files should be disposable.

The Commission did not change its 7-year retention period for appeals of adverse actions and grievances (APPEALS, 1). NNF had suggested 10 years. The descriptions of the "Other Policy and Procedure Files" (ADM. MANGMT., 2b), was retained. The accumulation is estimated in the Heise-Wolfinger memo at ca. 2½ cu. ft. per year.

One item of interest to NARS is Observers Reports under the Voting Rights Act of 1965 (LEGAL, 4d). NARS accessioned 22 cu. ft. of such records for the period 1965-72 in 1975, after the Commission had requested permission to dispose of them. NCD had agreed with NNF (Heise-Wolfinger memo), that the reports for 1973-75 should also be made permanent so as to have a record of voting practices for the first decade of the operation of this landmark act. The process of having Civil Service Commission observers in the voting places where Federal examiners had been appointed or where the Attorney General requested it was an important national phenomenon. In 1973, there were 288 observers covering elections in 4 States and in 1974, 196 observers in 3 States.

The Commission records officer, however, began transferring observer reports to the Justice Department (even though the Department receives the ribbon copy). NCD approved the practice after the fact. The schedule calls for the continuing transfer of the observer reports to Justice after 2 years. Our interest is in the reports up through 1975. Henry Wolfinger has pledged to try to find out what Justice is doing with them. If left at Justice, unnoted, they may be misplaced or forgotten. It would be difficult, if not impossible, for researchers to use them. As they are a logical continuation of the NARS accession (NN375-205, April 1975), I recommend that we urge NCD to accession them from the Justice Department. A copy of NN375-205 is attached.

It should also be noted that the Schedule was changed as requested by the Audiovisual Archives Division, items 5a, 6a, and 7a of INFORMATION SERVICES, and that the Director, MNV, concurred in the appraisal report, July 5, 1977.

Achronology of the development of the schedule so far as MNF is concerned, is also attached.

Mary Walton Livingston
MARY WALTON LIVINGSTON

July 12, 1977

Chronology, Schedule NCI-146-77-1, Records of the U.S. Civil Service Commission

May 3, 1976 Mary Walton Livingston received the draft schedule from NNF

May 14 MWL returned schedule to NNF with memo and notes on all 19 subject categories, pointing out some that were described only in a very general way and raising other objections.

June 2 NNF returned the schedule to NCD with a memo saying she and Mark Eckhoff had reviewed the schedule and agreed with MWL's comments on records for which more justification was needed and those described only in a general way; also proposed a 10-year retention period for case files instead of 7.

June 27 Ron Heise, NCD, to Director, NCD, said schedule included all but 5 changes sought by NCD and NNF. In a postscript he said: "As this job was drafted by NCD in 1975-76 and the first review made by NNF in May, 1976, NNF agreed to waive the strict series descriptions, arrangement statements, and volume figures."

July 14 Heise and Henry Wolfinger, NCD, in memo to NNF, responded to NNF memo of June 2 and the accompanying memo from MWL of May 14; did not agree to 7-year retention of case files; said ADP portion was not complete; said they would advise CSC to retain observer reports of elections through 1976; agreed to make certain procurement records and labor-management agreements disposable; justified retention of Government-wide life insurance contracts; agreed to make background papers of issuances disposable; justified description of policy and procedure files under Administrative Management; rewrote audits to retain only the final reports; justified legislative histories on the basis of past policy; agreed to make certain classification and compensation files disposable; justified retention of agency-wide personnel evaluations; agreed to make background material on tests disposable. CFPY.

Sept. 3 H. Wolfinger informed MWL that legislative histories accumulated 2
Sept. 10 NNF in memo to NN asked for guidelines as to whether to return schedule with general approval but noting it did not meet NN standards for series descriptions or return it with request it be redrafted by series.

Sept. 22 NN to NNF, said NCD should never have accepted this job from the agency but that it did not seem fair to reject it on grounds of no series descriptions as NNF had not so objected when it first received the schedule. NN also said:
"You, of course, cannot approve a schedule that is incomplete. And it cannot be completed until NNR finishes its appraisal. Therefore, if NCD is anxious to inform the agency of changes, it should prod NNF. In short, NNF should withhold its approval until the NNR portion is completed."

Sept. 22 NNF informed NCD (Wolfinger) of willingness to approve the schedule "... if the Commission accepts our compromise retention periods for the current job and the NNR portion is completed satisfactorily."

March 31, 1977 Director, Bureau of MGT. Services, CSC, signs Disposal Request, Form 115

July 1, 1977 Director, NCD, approves the appraisal report of appraisers Ron Heise and Henry Wolfinger on schedule NC 1 - 146-77-1. Not included in the schedule are the Commission's automatic data processing programs and records relating to classification and compensation. The appraisal report states that "these records will be covered by schedules that will be submitted to NARS for approval later this year."

July 5, 1977 Director, NNV, concurs in the appraisal report.

July 6, 1977 MWL receives the schedule from NNF for review.

July 13, 1977 MWL returns schedule to NNF with comments.

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington, DC 20408



DATE: June 27, 1977

REPLY TO
ATTN OF: NCD

SUBJECT: NCI-146-77-1

TO: Director, NCD

The schedule submitted by CSC for disposition authority includes all changes agreed to by NCD and NNF with five exceptions. CSC will not agree to the disposal of certain background files that NARS does not believe to have historical or other value. These items were excluded by CSC from this schedule and will be scheduled at a future date.

Since the last review by NNF the following items were added to the schedule:

- ADS-34 Administrative value only.
- APB-7 Reference file for ARB use.
- EMP-16 Included in ADM-9a as part of record set of publications. This item is listed separately for convenience of creating office.
- EMP 17-19 Records disposable under GRS 20. Listed here for convenience of creating office.
- EVA-6 Case files for compensation under FLSA have no value for historical research.
- EVA-7 Investigation case files under merit system have no value for historical research.
- EXR-25 Administrative use only.
- EXR-26 Administrative use only.
- INV-4a Control files-administrative use only.
- INV-12 Index to pending cases-administrative value.
- INV-13 and 18 Investigation related papers-administrative value.
- INV-19 Vital records program-non-record material.

The scheduling of the ADP records has not been completed. NNR has been working with the Commission on these files. In January 14, 1977, NNR wrote the Commission that all of their ADP files were disposable under GRS-20 and that an SF 115 would not be necessary. However, neither the Commission nor NCD could identify which individual ADP files were covered by which item in GRS-20. In



Keep Freedom in Your Future With U.S. Savings Bonds

early April, Tom Wadlow, Director of NCD, met with Charles Dollar, Director, NNR, to discuss this. Dr. Dollar agreed that NNR would furnish the Commission with a list showing the specific GRS-20 item that the individual ADP files were disposable under. Last week, however, NNR informed NCD that they could not tie all of the ADP files to GRS-20. They are now drafting a SF 115 to cover ADP files not under GRS-20.

As it may be several more months before the ADP schedule is complete, the Commission would like the textual part approved so that they can begin using it. NNF has agreed with all of the items proposed except the 15 items added since the last draft. These are mainly administrative records and should present no new problems.

Ronald L. Heise

RONALD L. HEISE
Records Disposition Division

As this job was drafted by NCD in 1975-76 and the first review made by NNF in May 1976, NNF agreed to waive the strict series descriptions, arrangement statements, and volume figures. *HH*

RET-1, RET-3, RET-4, RET-5, and RET-6 relate to annuity and death claims files of the civil service retirement system. At the time this schedule was developed, the Commission (BRIOH) informed us that there was no statute of limitations on the filing of a claim. However, legislation was being prepared to place a time limit on the filing of a claim. Until the legislation is worked out, the records relating to the claims must be retained indefinitely. As noted in Section IV of the appraisal report (GSA 7238), we will call the the Commission in six months if we haven't yet received a schedule on these files. Until then we are using "Disposal not authorized for lack of appropriate legislation." *HH*

XX

this reflects a misunderstanding of what NNR was doing. See inf memo to NN of 7/28/77.

Charles Dollar

JUL 28 1977

January 14, 1977

Mr. Charles Chesek
Records Officer
Civil Service Commission
Washington, DC 20415

Dear Mr. Chesek:

The ADP files and Data Automation Plans (DAP) of the Civil Service Commission listed on the attachment have been reviewed by my staff and have been determined "Disposable" based on information contained in the GSA 7036s submitted by the Commission. Since all of these files are "Disposable" under General Records Schedule 20, it is not necessary to list them on the SF 115. However, it should be clearly understood that no other machine-readable files in the Civil Service Commission can be disposed of without the prior submission and acceptance of additional SF 115s accompanied by a GSA 7036 for each file.

My staff appreciates the extra effort made in preparing the first schedule containing machine-readable records of the Civil Service Commission. It is on this basis, therefore, that we look forward to working with you in the future as additional machine-readable files are identified or created.

Sincerely,

CHARLES M. DOLLAR
Director
Machine-Readable Archives Division

Attachment

BA.CMD.aih.1.14.77

cc: OF file
DY file
FN

cc: Henry Wolfinger, NCD ✓

"Machine-Readable Files of the Civil Service

Commission rated Disposable"

A. Bureau of Management Services	DAP Code:
1. CSC Payroll	H 501
2. Work Reporting	H 502
3. Accounting Cost Based Budgeting System	H 503
4. Official Mail Sample	H 504
5. Telephone Directory	H 506
6. Time Sharing	H 511
7. Personnel Data Systems	H 513
B. Bureau of FEAA	
1. Commission's Appeals System	F 001
C. Bureau of Executive Manpower	
1. BEM MIS Position Incumbent	D 009A
2. BEM MIS Referral History	D 009C
3. Executive Inventory Weekly Edit	D 001B
4. Executive Inventory Edit and Update	D 001A
5. BEM MIS Case Control	D 009D
6. BEM MIS 915 Update	D 009B
D. Bureau of Intergovernmental Personnel	
1. Grant Aided Agency System	L 101
2. State and Local Government EEO Reports	L 110
E. Bureau of Labor Management Relations	
1. LAIRS I	J 001
F. Bureau of Policies and Standards	
1. OPAC Time Sharing	E 003
2. Computer Assisted Testing Program	E 096
G. Bureau of Manpower Information Systems	
1. Federal Equal Employment Opportunity	M 005
2. Age Discrimination	M 003
3. General EEO Support	M 004
4. Internal Minority Statistics	M 001
5. Voting Rights Program	I 111
6. Wage and Salary Study	H 417
7. Internal CSC Consultation	H 492
8. Monthly Payroll Report	H 415

DAP Code:

9. Upward Mobility Program	M 002
10. Geographic Study	H 416
11. General EEO Support	H 437
12. Women's Study	H 439

H. Bureau of Training

1. White Collar Employment Study	H 411
2. BT-1 Compilation	G 008
3. ET - Model (Educational Technology)	G 007

I. Bureau of Recruiting and Examining

1. Professional and Administrative Career Examination	A 001
2. Office Assistant	A 002
3. Junior Federal Assistant	A 003
4. Summer Employment	A 004
5. Designation Examination	A 005
6. New Hire Estimates Survey	A 012
7. D.C. Police, Fireman Promotion Exams	A 018
8. Selection Report from Nationwide Examination	A 048
9. Engineer and Scientist	A 050
10. PACE Batch Communication Project	A 051
11. Engineering and Physical Science Technician	A 056
12. Librarian, Social Worker, Correctional Treatment Specialist	A 060
13. FACS (Federal Automated Career System)	A 055

J. Bureau of Retirement, Insurance and Occupational Health

1. Service Credit System	N 102
2. Military Survey System	N 104E
3. Aging of Separation System	N 145
4. Annuity Roll - Daily Cycle System	N 103A
5. Annuity Roll - Monthly Cycle System	N 103B
6. Annuity Roll - Month End System	N 103C
7. Annuity Roll - CSC and LSF Processing System	N 103D
8. Annuitant Survey Programs	N 104A
9. Widow Survey System	N 104B
10. Disability Survey System	N 104C
11. Private Plan Recertification System	N 104D
12. SF-2812 Processing Programs	N 148
13. Annuity Tax System	N 149
14. Current FEGLI System	N 202
15. Semi Annual Headcount, CD System	N 307
16. Health Benefit - Special Programs	N 301
17. Semi Annual CSR/FEGLI Report from CPDF	N 803
18. D.C. Government - Special Runs	N 090
19. Annuity Rate Computation Program	N 101
20. Statistical Programs from Annuity Roll	N 804
21. Statistical Programs from CPDF	N 805
22. Actuary Programs	N 842
23. Medicare	P 003

GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICES		PAGE
INTRASERVICE MEMORANDUM AND ENDORSEMENT		OF PAGES
SUBJECT OR TRANSACTION		
Civil Service Commission Schedule		
FROM	TO	DATE AND MESSAGE
NNF	NN	9-10-76. In recent months NCD and NNF have had several exchanges of memorandums regarding the attached schedule for the Civil Service Commission. Before I went on leave in August I gave Clarence Lyons some informal notes containing my views on NCD's memorandum of 7-14-76 and asked that the interested parties confer about the problems, as suggested by Ron Heise. NNFL's memo of September 7 indicates that the conference was held on August 27 and that substantial agreement was reached on the specific points involved. However, the larger issue remains unresolved. Although the appraisal determinations are now generally satisfactory, the fact remains that the schedule has not been drafted in terms of series and, accordingly, will not meet the requirements of NN-NNB. In my first memo to NCD regarding this job (6-2-76) I informed them that the schedule had been difficult to review "because the files are not identified by office and are often described in very general terms rather than by series." As this is one of a number of schedules received from NCD that pose the same problem, NNF would welcome any guidelines concerning the way you wish them to be handled. Specifically, should I (1) return the CSC indicating general approval of the appraisal decisions but noting that the job does not meet NN standards re series descriptions etc. or (2) return the schedule without any approval comments, requesting that it be redrafted by series in accordance with N's instructions? <i>Jane F. Smith</i> JANE F. SMITH Director Civil Archives Division

(Over)

GSA FORM 6702

347

September 20, 1976

Mr. Charles R. Chesak, Chief
Records Administration Section
Bureau of Management Services
U.S. Civil Service Commission
Washington, DC 20415

Dear Charley:

This letter responds to your recent inquiry concerning our review of the draft records control schedule for the U.S. Civil Service Commission. Our review has included a careful appraisal of those records that the schedule designates for permanent retention. After a series of consultations with our Civil Archives Division, we have determined that a number of record series (or portions of series) do not have sufficient historical or other research value to warrant permanent retention by the Federal Government. The pertinent changes resulting from our review are noted in the copy of the schedule that we recently returned to you.

A majority of the changes in the schedule involve background materials accompanying the record copy of reports, directives, examinations, and other Commission issuances. NARS experience with similar background materials for other Federal agencies has demonstrated that such records rarely have more than minimal research values and thus do not warrant permanent retention.

We would appreciate your establishing appropriate retention periods for the records that NARS has designated as temporary (i.e., non-permanent). Once the records are appropriately scheduled, we will be able to recommend approval of the Commission's proposed schedule.

Sincerely,

(signed) THOMAS W. WADLOW

THOMAS W. WADLOW
Director
Records Disposition Division

CONCURRENCE: *James F. Smith* (initials)

WFW
OFFICIAL FILE:NC
DAY FILE:NC
NNF

HWOLFINGER:ed:9/20/76

July 14, 1976

NCD

Response to NNF comments on draft schedule for Civil Service Commission

TO: NNF

This memo responds to NNF's comments of June 2, 1976 (with accompanying memoranda of May 14, 1976), on the draft schedule for the U.S. Civil Service Commission. Most of the comments involved reservations about the designation of permanent retention for certain items in the schedule. We are responding to these comments in the lengthy portion of this memo relating to "permanent retention" (point 4 below). The following remarks apply to comments on other issues.

1. Appellate Case Files. NCD cannot agree to the suggestion that a minimum retention period of 10 years be imposed on the Commission's appellate case files. 41 C.F.R. 101-11.401 makes each Federal agency responsible for developing records schedules that provide for "minimum retention periods" for records designated for disposal. NARS' archival evaluation of records schedules does not involve the establishment of retention periods for temporary records, since the agency has the responsibility for determining the administrative, fiscal, and legal usefulness of records to its operations.

In addition, NARS previously has approved a 7-year retention period for most of the Commission's appellate case files (cf. APPEALS, Item 1c, of 178-D, current CSC schedule). The draft schedule extends the 7-year retention period to several other categories of Commission case files. The 7-year retention period is based on the 6-year statute of limitations in these matters.

2. ADP Section of Schedule. This portion of the schedule has not been completed. NNR and agency representatives are in the process of inventorying the Commission's machine-readable records.

3. Observer Reports, Voting Rights Program Records [LEGAL, Item 4d(1)]. We continue to believe that the observer reports have marginal research value at best, but NARS recently has accessioned such reports for the period 1963-75. Given this precedent, we will advise the agency to designate for permanent retention observer reports for the period 1973-75.

4. Permanent Retention (categories of items outlined on p. 3 of Livingston memo of May 14, 1976).

A. "Records that do not document a substantive function of the Commission." NCD does not object to the disposal of procurement and property sales files of \$25,000 or more . . . (ADM SERVICES, Items 2 and 21). We will advise the agency to delete these items from the schedule, since the records will be covered by Items 1 and 20 of this section. We do not object to the disposal of labor-management agreement files (PERSONNEL, Item 30) and will advise the agency to establish retention periods for these series. We do believe that these files have some research value, given the growth of unions in the Federal sector. On the other hand, the files do not relate to a Government-wide function administered by the Commission, and we can understand NNP's unwillingness to establish a precedent for permanent retention of such files for each Federal agency.

NCD believes that the Commission's health benefits and life insurance contract files (INSURANCE, Item 2a) should be designated for permanent retention. These files related to a Government-wide program affecting 3 million workers, retirees, and dependents, and involving expenditure of \$1.3 billion for health benefits alone in calendar year 1973. The files accumulate at the rate of 3 cu. ft./yr. (cfy) and document the substantive functions of negotiating rates and benefits and interpreting contract terms. The records are maintained by the Legislation and Policy Division, Bureau of Retirement, Insurance, and Occupational Health, and are not duplicated elsewhere in the Commission.

B. "Background and related papers . . . accompanying record copies of documents which themselves are sufficient for permanent preservation." NCD has phrased these items in accordance with NARS recommendations for permanent retention, issued to agency records officers in the form of appraisal guidelines and retention plans. We are aware that similar records, including substantive background papers, have been accessioned as archival material, on the grounds that these accompanying papers document the origin and purpose of the issuance, directive, or reports.

On the other hand, we recognize that these files often are not maintained in accordance with the standards of the schedules and much ephemeral material is filed with the substantive background papers. Our examination of the Commission issuance files revealed that such ephemeral material comprises a substantial portion of the files. In addition, the variety and number of Commission issuances is large, given the agency's Government-wide responsibility for FPM issuances and supplements, GS and WG handbooks, pay and leave regulations, occupational series definitions and qualification standards, in addition to its responsibility for the usual agency issuances—forms, internal directives, reports. NCD therefore has no objection to advising the Commission to eliminate background and related papers from series of issuances designated for permanent retention.

C. "Records requiring further justification or explanation . . . though they relate to substantive functions of the Commission." NCD believes that each of these series has substantive research value and offers the following additional information about each item.

Other policy and procedure files (ADM MNGMT, Item 2b). Records documenting Commission decisions and minutes normally are filed in the Commission's central office policy and procedure file (also known as the "Executive File") maintained by the Records Service Unit. However, a few bureaus and staff offices traditionally maintain such records at the operating level. The division of this item into two parts (Items 2a and 2b) is meant to assure the permanent retention of this series, whether located with the Records Service Unit or within an operating unit. A more detailed definition of this series is given in the attached Commission transmittal (Attachment A). The accumulation of the central office policy and procedure files over the past decade has been ca. 7 1/2 cu. ft./yr. The accumulation of decentralized policy and procedure files is estimated at no more than 2 1/2 cu. ft./yr.

Management audit case files (ADM MNGMT, Item 8a). This item needs to be rewritten in accordance with the original NARS recommendation, namely, with the final audit reports designated for permanent retention and with all work papers and correspondence relating to compilation of the reports designated for disposal. The final reports document comprehensive audit of central office and regional operations (cf. Attachment B) and cover such areas as workload and production, personnel practices (including EEO), and compliance with administrative and fiscal procedures. These reports document the overall operation of Commission programs in a manner that procedural issuances and summary reports do not. The reports accumulate at the rate of ca. 1 1/2 lin. ft./yr.

Legislative bill files (LEGAL, Item 3a). NARS consistently has recommended and approved permanent retention of this item at agency level, since it documents the agency's official reactions to legislation affecting and defining the functions of the agency. It is our impression that there is some overlap between OMB and CSC legislative files, but agency legislative files offer the most full and complete account of agency reaction to legislation, since they contain internal memoranda that do not reach OMB.

Significant or unique personnel research and development case files (CLASFCIN & COMPNSTN, Item 1a). We have no objection to advising the Commission not to designate case file material (exclusive of the record copy of the report) for permanent retention. This issue more properly relates to Category B, "Background and related papers . . . accompanying record copies of documents which themselves are sufficient for permanent retention."

Agency-wide personnel management evaluations (PMEs) and special studies (EVALINS, Item 1a). These reports and studies, formerly known as inspection reports, were approved for disposal in 1952 and 1956 (Disposal Job Nos. 352-S187 and II-NNA-2184, copies enclosed as Attachment C). However, there have been major changes in the purpose and scope of inspections over the past 20 years. Not only do PMEs now document a substantive program of the Commission, but they furnish analyses of personnel management within individual Federal agencies. Donald E. Harvey's The Civil Service Commission (p. 104) describes the manner in which inspections have broadened in recent years:

When inspections were first begun, they were largely confined to audits of personnel actions. As the Commission's role and interests have broadened, however, its inspections have also broadened, to encompass the wide spectrum of personnel management throughout the agency. Once they concentrated almost exclusively on the operations of personnel offices; now they encompass the actions, attitudes, and problems of top management, supervisors, employees, and personnel technicians.

PMEs of individual installations remain disposable. Agency-wide evaluations and special studies, designated for permanent retention, accumulate at the rate of less than 2 lin. ft./yr.

D. "Records described only in a very general way."

Charters, agendas, minutes . . . of boards, committees . . . over which the Commission had administrative jurisdiction, such as . . . (COM MNGMT, Item 1a). Since this schedule, when approved, will grant continuing authority for the disposition of records, we see no need for a listing of each and every committee, both defunct and functioning, covered by the schedule. A schedule containing a list of committees would be outdated and inapplicable with the establishment of a new committee. Our description of this item furnishes examples of boards, committees, councils, and groups to which the item applies. These examples are not meant to be comprehensive. It should also be noted that records of panels, workshops, and non-project working groups are disposable under ADM MNGMT, Item 5.

Basic file showing development of test, . . . including one processed copy and index thereto (EXNG & RECRTG, Item 5a). Review of this series has convinced us that only the processed copy of the test and index thereto have sufficient research value to warrant permanent retention. We will advise the agency to revise the item accordingly. We have been informed

that the tests and related indexes accumulate at the rate of less than 2 cu. ft./yr and that the tests are not computerized on magnetic tape.

HENRY J. WOLFINGER

RONALD L. HEISE
Records Disposition Division

OFFICIAL FILE:NC
DAW FILE:NC

HWOLFINGER/RHEISE:od: 7/14/76

RL 1/1/76

14 19 Jul 76

GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICES		PAGE
INTRASERVICE MEMORANDUM AND ENDORSEMENT		OF PAGE
SUBJECT OR TRANSACTION		
Draft of Civil Service Commission Schedule		
FROM	TO	DATE AND MESSAGE
NDP	NCD	6-2-76. Mrs. Mary Walton Livingston has analyzed this proposed Civil Service Commission schedule very thoroughly and has indicated her reservations, if any, in separate memoranda for each part of the schedule. In addition, her reservations and recommendations are summarized under four categories set forth in her attached general memorandum regarding this job. Mr. Eckhoff and I have also spent considerable time reviewing the schedule and both of us agree completely with Mrs. Livingston's comments under categories 3 and 4 of her memorandum. All of us are somewhat concerned about the proposed destruction of all case files of the Commission after 7 years, but it would be difficult to justify keeping them permanently and the selection of case files under established criteria doesn't seem to be feasible. If they could be retained for 10 years at least two succeeding Presidential administrations would have an opportunity to review them, whether they involved adverse actions, unfair labor practices, or political activities. Presumably a 7 year retention period is provided because the statute of limitations expires in that time. Incidentally, can the item be identified that would permit the Commission to dispose of records related to political appointments in 2 years instead of 5? This schedule has been difficult to review because the files are not identified by office and are often described in very general terms rather than by series. For this reason we do want to see samples of records on health benefits, (insurance, item 2a), category 1, as well as the "background and related papers on administrative management and classification" covered by category 2. We do not think that we can make commitments on the

(Over)

CSA FORM 67 6702

May 14, 1976

TO: NNFL
NMF

FROM: Mary Walton Livingston

SUBJECT: Proposed schedule for records of the U.S. Civil Service Commission

The schedule proposed by NCD for records of the U.S. Civil Service Commission (copy attached), contains approximately 413 entries, mainly arranged by function, not by office or division. It should be noted at the outset that the Commission over the years has offered few of its records to the National Archives. Negotiations to accession the first volume of the official minutes, 1883, are just now under textual way. The records accessioned to date, amounting in all to 144 cubic feet, consist of a fragments of a few series, 1871-1946, and records on the Voting Rights Act, 1965-72. They offer little basis for comparison with the records in the proposed schedule.

The proposed schedule makes significant changes in the schedule incorporated in the Commission's 1962 Administrative Manual Supplement: Disposition of Records, the basic document that still guides record disposition although amended in some parts. Changes are particularly evident in the disposition of the Commission's case files. Under the proposed schedule, Government-wide appeals of adverse actions, RIFs, etc., EEO cases, unfair labor practices under union-management agreements, and political activity (Hatch Act) cases are to be disposed of in 7 years after the annual breaks in the files. Formerly, these types of cases were scheduled for permanent retention.

The proposed schedule continues the 20-year retention period for investigatory files, already in effect, but which is lower than the 25-year period under the 1962 schedule. ^(*) It also proposes disposal of all investigations at the end of the retention period. The 1962 schedule had excepted those investigations that the National Archive might designate for permanent retention. Investigations account for approximately 28,000 cubic feet out of a total of approximately 36,000 cubic feet stored by the Commission at WHRC as of March 3, 1976.

I concur in the recommendations to dispose of case files and investigations as I believe they would be little used for historical research, first because of considerations of privacy rights of employees or because their very volume makes research for general historical trends all but impossible. I also concur in NCD's other recommendations for disposal except in the case of CSC of observers' reports under the Voting Rights Act. An explanation is given for this under the "Legal" section of the schedule.

By way of contrast, I am unable to concur in 10 recommendations for permanent retention, at least not on the basis of my present information. My reservations are pinpointed in separate memoranda (copies attached) for each part of the schedule, but, for the sake of convenience, are summarized under the following four categories.

^(*) Reference is to 1962 CSC printed manual incorporating provisions of NARS Disposition Job No. II NNA 3152, approved January 19, 1960.

1. Records that do not document a substantive function of the Commission:

Procurement Files of \$25,000 or more . . . (Adm. Services, item 2);
 Sales of property of \$25,000 or more . . . (Adm. Services, item 21);
 Health Benefits and Life Insurance Contract Files (Insurance, item 2a);
 Labor Management Agreement Files, central and regional (Personnel-CSC, item 30);
 Labor Management Agreement Files, central office files involving
 reviews of regional office contract proposals (Personnel-CSC, item 30b);

2. Background and related papers on administrative management and classification accompany ^{the} record copies of documents which themselves are sufficient for permanent preservation:

Background papers, Issuances (Adm. Management, item 6);
 Background papers for Internal Directives (Adm. Management, item 7);
 Background papers on reports, pamphlets, etc. (Adm. Management, item 9a);
 Selected background material on annual reports (Adm. Management, item 11a);
 Related papers on forms (Adm. Management, item 16a).

Background material on Occupational Series Definitions (Class. and Comp., 1a);
 Background material, Pay and Leave Regulations (Class. and Comp., 2a);
 Background material, Occupational Qualification Standards (Class. & Comp., 3a).

3. Records requiring further justification or explanation even though they relate to substantive functions of the Commission:

Other Policy and Procedure Files (Adm. Management, item 2b);
 Management audit Case Files (Adm. Management, item 8a);
 Legislative Bill Files (Legal, item 3a);
 Personnel Research and Development Project Files, Significant
 or Unique Case Files (Classification and Compensation, item 4a);
 Personnel management evaluations and special studies (Evaluation, item 1a).

4. Records described only in a very general way:

Charters, agendas, minutes . . . of boards, committees, councils, groups, etc. over which the Commission has administrative jurisdiction such as, the Interagency Advisory Group, and three others — not a complete listing (Committee Management, item 1a).

Test material. Basic file showing development of test . . . and other material of permanent value in test development (Examining and Recruiting, item 5a).

The Audiovisual Archives Division is reviewing the items pertaining to still and motion pictures (Information Services, items 5a and 6a).

The Machine-readable Archives Division is reviewing the portions of the schedule on magnetic tapes (no copies referred to NNF). As the tapes may have a direct bearing on the value especially test materials (Evaluations) of the textual records, I recommend that NNF be given the opportunity to study NNR's findings before the schedule is finally approved by the Archivist.

Midway in my review of this schedule, I conferred with Henry Wolfinger, NCD, one of the archivists who drew it up. As a result of his explanations, I modified several of my conclusions but believe a burden of proof still remains on NCD to justify permanent preservation of the 20 items listed above. Additional comments on each of these are attached to the appropriate part of the schedule. A copy of the WERC printout for Record Group 146, Records of the U. S. Civil Service Commission, March 3, 1976, is also attached.

Mary Walton Livingston
MARY WALTON LIVINGSTON

Enclosures: Schedule, with comments by MWL.
Printout

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington, DC 20408



May 12, 1976

NNV

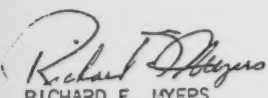
Draft records schedule - U.S. Civil Service Commission

NCD

We recommend the following in regard to the above schedule.

1. For items designated as permanent, specify a particular time period, preferably 5 years, after which records should be offered. For example; Offer to the National Archives after 5 years or when no longer needed for operational purposes whichever occurs first.
2. Item 5. a. (1) add the word captioned following the word single.
3. Item 6. a. should read: For each motion picture, the original negative, a master positive, and a positive print; for each video tape, the original or the earliest generation or a kinescope; for each disc sound recording, the master tape, matrix or stamper, and one disc pressing; for each magnetic audio tape recording, the original tape.
4. Add as a permanent item the following:
Finding aids and production documentation for audiovisual records - existing finding aids such as data sheets, shot lists, catalogs, indexes, and other textual documentation necessary for the proper identification, retrieval, and use of the audiovisual records as well as production case files or similar files which include copies of production contracts, scripts, transcripts, or other documentation bearing on the origin, acquisition, release or ownership of the audiovisual production.

The rest of the schedule looks fine.


RICHARD F. MYERS
Audiovisual Archives Division

DANIEL K. INOUE, SENATOR, CHAIRMAN
 HARRY GOLDWATER, ARIZ., VICE CHAIRMAN
 DONALD W. RIECK, IND.
 ASHLEY E. STEVENSON, ILL.
 WILLIAM D'ATHWAY, MAINE
 WALTER D. HODGES, N.Y.
 JOSEPH R. BIDEN, JR., DEL.
 ROBERT MORGAN, N.C.
 GARY HART, CONN.
 DANIEL PATRICK MOYNIHAN, N.Y.

ROBERT C. BYRD, W. VA., EX OFFICIO
 HOWARD H. BAKER, JR., TENN., EX OFFICIO

WILLIAM G. MILLER, STAFF DIRECTOR
 EARL D. EISENHOWER, MINORITY STAFF DIRECTOR

United States Senate

SELECT COMMITTEE ON INTELLIGENCE

(SUBCOMMITTEE TO S. RES. 400, 97TH CONGRESS)

WASHINGTON, D.C. 20510

December 21, 1977

Received NA-11
 DEC 28 1977

IN REPLY PLEASE
 REFER TO Q#1237

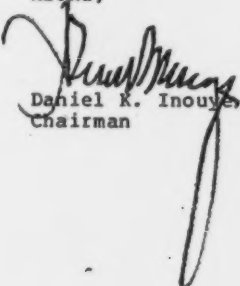
Hon. James B. Rhoads
 Archivist of the United States
 Seventh and Pennsylvania Avenues
 Washington, D. C. 20408

Dear Mr. Rhoads:

On July 17, 1976 I requested that the moratorium on destruction of intelligence and investigative records originally requested by Senators Mansfield and Scott be extended through December 17, 1976. No further extensions have been formally requested. Therefore, all agencies maintaining records pursuant to the moratorium may return to normal records destruction policies.

I would request that any changes in records maintenance or destruction procedures affecting intelligence or investigations which have been promulgated since the moratorium was instituted as well as any future changes in procedures be brought to the attention of the Senate Select Committee on Intelligence.

Aloha,


 Daniel K. Inoué
 Chairman

United States Senate

COMMITTEE ON THE JUDICIARY
WASHINGTON, D.C. 20540

March 1, 1978

Honorable Alan K. Campbell, Chairman
U.S. Civil Service Commission
Washington, D. C.TO: *Mr. Campbell*
Mr. Brennan
FOR Chairman's Signature

Dear Commissioner Campbell:

Thank you for your appearance before the Senate Subcommittee on Criminal Laws and Procedures on February 9, 1978. Your testimony concerning the impact that the erosion of law enforcement intelligence has had on your ability to implement the Federal Employee Security Program was helpful to our understanding of the problem.

In all frankness, we were profoundly disturbed by some of the answers which you and Mr. Drummond gave in the course of your testimony.

A very serious question is raised by your statement that "most law enforcement officials personally would like to cooperate with us, but because of confusion resulting from different interpretations of LEAA regulations, Privacy Act provisions and state laws, they play it safe by declining to release information. If you can't get information from local law enforcement agencies, it becomes abundantly clear that your ability to do meaningful background checks is virtually non-existent.

Although the primary focus of our recent hearing was on the impact that the erosion of law enforcement intelligence has had on the public security, we were particularly disturbed by what emerged concerning the entire state of our Federal Loyalty-Security Program.

You were asked whether loyalty to the United States Government was still a condition of Federal employment - and you replied that it was. You next agreed that "The starting point of any intelligence operation relating to personnel security in Federal employment would be the establishment of certain criteria or guidelines." But then you testified that you did not have any such criteria.

Then it emerged that as matters now stand you do not even ask questions of applicants for sensitive positions whether they are or have

been members of Communist or Nazi or other totalitarian or violence-prone organizations - that, in the absence of an overt act, mere membership in such organizations would not disqualify a person for Federal employment. In the course of the questioning, we mentioned quite a number of organizations - the American Communist Party; the KKK; the American Nazi Party; the Maoists; the Trotskyists; the Prairie Fire Organizing Committee - which publicly supports the terrorist activities of the Weather Underground; the Puerto Rican Socialist Party - which similarly supports and defends the violence perpetrated by the Puerto Rican terrorists; the Jewish Defense League - which engages, in its own name, in acts of violence; and the Palestine Liberation Organization - whose American affiliates support the terrorist acts perpetrated by its parent organization in other countries. The same answer, apparently, applied to all organizations: In the absence of an overt act, mere membership is not a bar to Federal employment.

On the question of mere membership, Mr. Drummond at one point stated that, if it were discovered that an applicant was a member of the KKK, he probably would not be considered suitable for a job with the Equal Employment Opportunities Commission - although his membership would apparently be no bar to employment in other government positions, even sensitive positions. What Mr. Drummond did not explain was how you could possibly find out that an applicant was a member of the KKK if you cannot ask the applicant or those who know him any questions about mere membership in any organization. Nor did Mr. Drummond offer any example of the kind of employment for which mere members of the many other organizations of the far left and the far right might be found unsuitable.

You also informed the Subcommittee that the Index Card System set up in the forties has been eliminated "by action of the Commission", pursuant to Section (e)(7) of the Privacy Act; and that you have notified GAO that you "will adopt the GAO recommendation to dispose" of the organizational files which still remain in the possession of the Commission.

In the light of this information, I find it difficult to avoid the conclusion that over the past five years or so, without the knowledge of Congress and contrary to statutory requirement and the Commission's own regulations, there has been a progressive dismantling of the

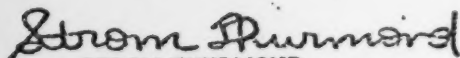
Federal Loyalty-Security Program - until today, for all practical purposes, we do not have a Federal Employee Security Program worthy of the name.

Your statements and those of the GAO Report on the contemplated destruction of files are both disturbing and confusing. The GAO Report on page vi said "The Commission has decided to destroy its security files on alleged subversive and disloyal activities." I note that this went somewhat beyond the recommendation of the GAO itself, which simply suggested that the Civil Service Commission "obtain authorization from Congress for the files on alleged subversive and radical organizations, or delete them." Moreover, when you said that "the Index to the Security Research files was eliminated pursuant to Section (c)(7) of the Privacy Act", it was unclear whether they have been physically eliminated or simply locked up, or whether you contemplate their physical elimination.

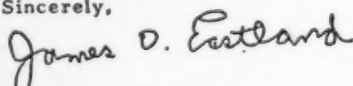
We ask that you postpone taking any irrevocable action with regard to the files currently in your possession until Congress has had an opportunity to consider the matter and make a finding.

With our thanks for your cooperation in this matter.

Sincerely,



STROM THURMOND
Ranking Minority Member



JAMES O. EASTLAND
Chairman

STROM THURMOND, S.C., CHAIRMAN
 CHARLES MCC. MAHIAS, JR., MD. JOSEPH R. BIDEN, JR., DEL.
 PAUL LAXALT, NEV. EDWARD W. KENNEDY, MASS.
 ORRIN G. HATCH, UTAH ROBERT C. BYRD, W. VA.
 ROBERT DOLE, KANS. HOWARD M. METZENBAUM, OHIO
 ALAN K. SIMPSON, WYO. DENNIS DECONCINI, ARIZ.
 JOHN EAST, N.C. PATRICK J. LEAHY, VT.
 CHARLES E. GRASSLEY, IOWA MAX BAUCUS, MONT.
 JEREMIAH DENTON, ALA. HOWELL HEFLIN, ALA.
 ARLEN SPECTER, PA.
 ENDRY SNEEDER, CHIEF COUNSEL
 QUENTIN CROWNEIN, JR., STAFF DIRECTOR

United States Senate

COMMITTEE ON THE JUDICIARY
 WASHINGTON, D.C. 20510

June 9, 1981

NEO - 6/12/81
 NED - 6/12/81
 NC - 3 4/81
 RECEIVED
 6/12/81
 Copy to New
 3 4/81

Mr. George Scaboo
 Office of Federal Records Center
 National Archives and Records Service
 Washington, D.C. 20408

Dear Mr. Scaboo:

I am writing in response to your letter on June 2, 1981 regarding the disposal of the CSC personnel security investigative files for the years 1928 to 1959, which are stored at the Washington National Records Center (WNRC).

I can assure you that the Committee on the Judiciary is aware of the storage problems which are facing your office.

I would appreciate it if no action is taken on these or later security investigative files until the Judiciary Committee has had an opportunity to study this matter.

Thank you for your assistance in this matter.

With kindest regards and best wishes,

Sincerely,

Strom Thurmond
 Strom Thurmond
 Chairman

ST:jvx

REQUEST FOR RECORDS DISPOSITION AUTHORITY (See instructions on reverse)

TO: GENERAL SERVICES ADMINISTRATION,
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)

Office of Personnel Management

2. MAJOR SUBDIVISION

Office of Management

3. MINOR SUBDIVISION

Administrative Systems Division

4. NAME OF PERSON WITH WHOM TO CONFER

Charles R. Chesek

5. TEL. EXT.

632-4533

LEAVE BLANK	
JOB NO.	
NC1-146-81-1	
DATE RECEIVED	
April 8, 1981	
NOTIFICATION TO AGENCY	
If accordance with the provisions of 22 U.S.C. 2303, the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "withdrawn" in column 10.	
4-30-81 Date	<i>W. H. Mac</i> Archivist of the United States

6. CERTIFICATE OF AGENCY REPRESENTATIVE

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of 1 page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified.

☐ A Request for immediate disposal.

☒ B Request for disposal after a specified period of time or request for permanent retention.

C. DATE	D. SIGNATURE OF AGENCY REPRESENTATIVE	E. TITLE	7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
3/26/81	<i>Joseph L. Reid</i>	Chief, Administrative Systems Division		Amend the Investigation (INV) portion of our disposition schedule as per attached.	AMS 44-3	

115-107

*Closed Out: 6-4-81: R.T.D.
Copy to All FRC's, Agency & NAF*

STANDARD FORM 115
Revised April, 1975
Prescribed by General Services
Administration
FPMR (41 CFR) 101-11.4

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INVESTIGATIONS	
	This grouping of records consists of documents relating to the Government-wide investigative program.	
1.	Investigative Case Files. a. Record copies of reports and related papers maintained in the ~~Division of Personnel Investigations~~ <i>Division of Personnel Investigations</i> (DPZ). b. Copies of reports, related papers, and investigator notes retained in Regional Investigations Division (RID), including ~~Investigative Support Branch~~ <i>Investigative Support Branch</i> (ISB). (1) Copies of region of origin cases. (2) Copies of participating region cases. (3) Copies of spot checks, personal confidential inquiries, and personal record searches. (4) Copies of political activity, and other special types of investigative cases. c. Bar and Flag Files, excluding medical flags. (1) Record copies of closed cases resulting in debarment or flagging. ~~(2) Regional office copies of closed cases which result in debarment or flagging.~~	Break closed cases annually. ~~Transfer to WHRC 5 years after break.~~ Destroy when 15 years old. ~~and destroy after~~ Break closed cases every 3 months. ~~Destroy 3 months after break.~~ ~~and destroy after~~ Break closed cases every 3 months. ~~Destroy 3 months after break.~~ ~~and destroy after~~ Break closed cases every 3 months. ~~Destroy 3 months after break.~~ ~~and destroy after~~ Break closed cases every 3 months. ~~Destroy 3 months after break.~~ Break closed cases annually. ~~Transfer to WHRC 5 years after break.~~ Destroy when 15 years old. ~~Break closed cases every 3 months. Destroy 3 months after break.~~ ~~Investigative Support Branch (ISB) destroy after 3 months~~ Break closed cases annually. Break closed cases every 3 months. Destroy 3 months after break. Break closed cases annually. Transfer to WHRC 5 years after break. Destroy when 15 years old. ~~Since no investigation file is not maintained, remove from active file. Guide from date of final action and in distribution. Reinitiation file for 20 years then destroy. Remove all other cards from active files 20 years after the date of final action and destroy.~~
2.	National Agency Check and Inquiry Case Files: includes inquiry forms, results of National Agency Checks, and related case papers. a. Files marked "Clear - file retained in ~~region~~ <i>Investigative Support Branch</i> for destruction" under instructions in FPM Supplement 736-72 (Internal). b. Files marked "File to ~~DPZ~~ <i>DPZ</i>" under instructions in FPM Supplement 736-72 (Internal).	
3.	Security Investigations Index (SII), ~~central office~~ <i>Investigative Support Branch</i> (x56) index to personnel investigations.	

3.10.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. <i>National Office (DPS)</i> a. ~~Control Office (DPS)~~ <i>Investigations Washington Branch (IWB)</i> b. ~~Washington Division of Investigation (WDI)~~ and RID.	Break closed cards annually. Destroy 4 years after break. Break ~~and destroy~~ <i>3 months</i> Break closed cards ~~and destroy~~ ~~Destroy 6 months after break~~
5.	Desk Case Control File; card record of pending cases maintained by deadline date in ~~DDI~~ , ~~WDI~~ and RID. <i>DPS, IWB</i>	Destroy when case is closed.
~~6.~~	~~Investigations Security Reference File~~	~~Destroy upon completion of program~~
~~7.~~	~~Loyalty Connection to FBI and Record of Processing FBI Investigation File (in Form 127, or equivalent)~~	~~Break annually. Destroy 2 years after break~~
<i>9.6</i>	Regional office evaluation reports.	Break annually. Destroy <i>3</i> years after break.
<i>9.7</i>	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
<i>9.8</i>	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
<i>10.9</i>	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of ~~case~~ investigative file, or destroyed if investigative file belongs to another agency.
<i>11.10</i>	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
<i>11.12</i>	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
~~12.~~	~~Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FBI Supplement (Interim) 756-72.~~	~~Break annually. Destroy 2 years after break~~
<i>13.13</i>	<i>OPM</i> ~~656~~ Form 2799, or equivalent, Daily Report of Investigator.	Break quarterly. Destroy no later than one year after break.
<i>14.13</i>	Security program workload report.	Break annually. Destroy 1 year after break.
<i>15.14</i>	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 1
November 1957

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
24.15 25.	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
26.	~~Relocation file, folder containing duplicate information relating to personnel investigation and adjudications which are not retention at a relocation site for use in the event of a national emergency.~~	~~Transfer to relocation site when sufficient number available.~~

AM Supplement 44-3

51

Inst. 4
November 1977
March 1981

APPRAISAL REPORT ON RECORDS DISPOSITION REQUEST

JOB NUMBER

NCL-146-81-1

SECTION I - ACTION TAKEN

- ☒ 1. **APPROVED FOR DISPOSAL:** The records described under all items of the schedule, except those that may be listed in blocks 2, 3, and 4 of this section, are disposable because they do not have sufficient value for purposes of historical or other research, functional documentation, or the protection of individual rights to warrant permanent retention by the Federal Government.

GENERAL ACCOUNTING OFFICE CONCURRENCE ☒ IS NOT NECESSARY ☐ IS NECESSARY AND HAS BEEN OBTAINED.

- ☐ 2. **APPROVED FOR PERMANENT RETENTION:** The records described under the following item or items have been appraised by the National Archives and Records Service (NARS) and are designated for permanent retention by the Federal Government. The agency will offer these records to NARS as specified in the schedule.

- ☐ 3. **DISPOSITION NOT APPROVED:** The records described under the following item or items are not approved for disposition. See Section III of this form for explanation.

- ☐ 4. **WITHDRAWN:** The records described under the following item or items have been withdrawn at the request of the agency.

SECTION II - RECOMMENDATION/CONCURRENCES

	TITLE	SIGNATURE	DATE
4/28/81 APPRAISAL	APPRAISER	Debra Wallace Leahy	4-24-81
	DIRECTOR, RECORDS DISPOSITION DIVISION	Jean K. Fraley, Acting	4/27/81
CON- CURRENCES			

SECTION III - APPRAISER'S COMMENTS

This job revises the section of NCL-146-77-1 which relates to the investigative program at the Office of Personnel Management. Concurrence by NNF is not necessary because the records were previously authorized for disposal.

June 9, 1981

NC

Deferral of disposition of CSC personnel security investigative case files and indexes. 1928-1959

Director, WNRC - NCW

Enclosed is a copy of NC1-146-81-1, recently transmitted to you under NCD 81-98, covering the personnel investigative records maintained by the Office of Personnel Management (OPM). Please note that the retention periods for Items 1a and 3, investigative case files and security investigations index, have been reduced by five years.

As you know, disposition of these records is still deferred pursuant to a letter from Senator Strom Thurmond to Alan Campbell, then Chairman of the Civil Service Commission, dated March 1, 1978. We have recently written to Senator Thurmond, asking his concurrence in lifting the freeze on these records (a copy of our letter is enclosed) and will let you know the results of our request. We also have enclosed a copy of our letter to Donald J. Devine, Director of OPM, notifying him of our correspondence with Thurmond.

GEORGE N. SCABOO
Acting Assistant Archivist
for Federal Records Centers

Enclosures

cc: NC1-146-81-1 (Leahy)
Official file: NC
Day File: NC

LEAHY/cm/6/9/81

JUN 1 1981

Mr. Donald J. Devine
 Director
 Office of Personnel Management
 1900 E Street, NW
 Washington, DC 20415

Dear Mr. Devine:

As a result of testimony of your predecessor, Mr. Alan E. Campbell, before the Senate Committee on the Judiciary on February 9, 1978, a freeze was placed on disposal of some 20,000 cubic feet of Civil Service Commission (CSC) personnel security investigative files, 1928-1958, stored at the Washington National Records Center (WNRC). The records were authorized for disposal when 20 years old pursuant to Disposition Job No. NCI-146-77-1 (Item INV-1a), approved by the Archivist on August 1, 1977.

Since that time, we have asked your agency on several occasions to inform us of the resolution of the Committee's request, but have received no response to our inquiries. Instead OPM recently has requested the reduction of the retention period for these same investigative files from 20 to 15 years. I recently approved this request, NCI-146-81-1 (copy attached). The WNRC, however, still is storing 20,000 cubic feet of records which have been eligible for disposal under the old authority since FY 1980. Under the new authority, an additional 6700 cubic feet of records now are eligible for disposal. Prompt disposition of these records is essential in order to alleviate a serious space problem facing the Federal records center system. Because of the urgency of the situation, I have decided therefore to write directly to the Senate Committee about this matter. A copy of our letter is enclosed for your information any assistance, however, your agency can provide will be appreciated.

Sincerely, /

ROBERT M. WARNER
 Archivist of the United States

Enclosures

cc: N
 NF
 ECR
 NCI-146-81-1

OFFICIAL FILE:NC
 DAY FILE:NC
 LEAHY:rd:5-18-81

JUN 1 1981

Honorable Strom Thurmond
Chairman
Committee on the Judiciary
United States Senate
Washington, DC 20510

Dear Senator Thurmond:

I am writing to ask your concurrence in the immediate disposal of nearly 20,000 cubic feet of CSC personnel security investigative files for the years 1928-1959, stored at the Washington National Records Center (WNRC). Disposal of these records was deferred in accordance with the Judiciary Committee's letter of March 1, 1978, to Mr. Alan Campbell, Chairman of what then was the U.S. Civil Service Commission (CSC). The Committee's letter asked that the Commission postpone the destruction of "its security files on alleged subversive and disloyal activities... until Congress has had an opportunity to consider the matter and make a finding" (see enclosed copy).

Since 1978, severe shortages of storage space for records have developed at many of our Federal records centers. At times transfers of records from Federal agencies have had to be deferred. This has resulted in higher costs to the Government due to the greater expense of storing records in office space. Your cooperation in disposal of the 20,000 cubic feet of records at WNRC, therefore, would result in the freeing of much-needed space for other agency records.

The CSC files contain investigative information regarding an individual's character, conduct, and behavior in the community where he or she lived, and were compiled to permit determination of suitability and fitness for Federal employment, employment in the Government of the District of Columbia and international organizations, access and security clearances, evaluations of qualifications, loyalty to the U.S., and evaluations of qualifications and suitability for performance of contractual services for the U.S. Government. The records originally were scheduled for disposal when 20 years old, pursuant to Disposition Job No. NC1-146-77-1, approved by the Archivist on August 1, 1977. The retention period recently has been reduced to 15 years at the request of OPM (Disposition Job No. NC1-146-81-1, copy enclosed).

We have asked CSC and its successor agency, the Office of Personnel Management (OPM), on several occasions since 1978 to inform us of the resolution of the Judiciary Committee's request, but have received no response to our inquiries. Consequently, we decided to write directly to you about this matter. If you or your staff have any questions, please call George Scaboo, Acting Assistant Archivist for Federal Records Centers, at 724-1614. Your assistance in this matter is appreciated.

Sincerely, 

ROBERT M. WARNER
Archivist of the United States

Enclosures

cc: Mr. Donald Devine
Director, Office of Personnel Management

cc: N

cc: NN
NCW

OFFICIAL FILE:NC
DAY FILE:NC
LEAHY:k&5-19-81

REQUEST FOR RECORDS DISPOSITION AUTHORITY
(See Instructions on reverse)

TO GENERAL SERVICES ADMINISTRATION,
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)

Office of Personnel Management

2. MAJOR SUBDIVISION

Office of Management

3. MINOR SUBDIVISION

Administrative Systems Division

4. NAME OF PERSON WITH WHOM TO CONFER

Charles R. Cheseak

5. TEL. EXT.

632-4533

LEAVE BLANK	
JOB NO.	NC1-146-81-1
DATE RECEIVED	April 8, 1981
NOTIFICATION TO AGENCY	
In accordance with the provisions of 44 U.S.C. 3303a the disposal of records, including amendments, is approved except for items that may be stamped "dispute" not approved" or "withdrawn" in column 10	
4-30-81 Date	<i>W. M. W.</i> Archivist of the United States

6. CERTIFICATE OF AGENCY REPRESENTATIVE

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of 1 page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified.

☐ A Request for immediate disposal.

☒ B Request for disposal after a specified period of time or request for permanent retention.

C. DATE <i>3/26/81</i>	D. SIGNATURE OF AGENCY REPRESENTATIVE <i>Joseph F. Reid</i>	E. TITLE Chief, Administrative Systems Division
7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO. ACTION TAKEN
	Amend the Investigation (INV) portion of our disposition schedule as per attached.	AMS 44-3

APPRAISAL REPORT ON RECORDS DISPOSITION REQUEST

JOB NUMBER

NCI-146-81-1

SECTION I - ACTION TAKEN

- ☒ 1. **APPROVED FOR DISPOSAL:** The records described under all items of the schedule, except those that may be listed in blocks 2, 3, and 4 of this section, are disposable because they do not have sufficient value for purposes of historical or other research, functional documentation, or the protection of individual rights to warrant permanent retention by the Federal Government.

GENERAL ACCOUNTING OFFICE CONCURRENCE ☒ IS NOT NECESSARY ☐ IS NECESSARY AND HAS BEEN OBTAINED.

- ☐ 2. **APPROVED FOR PERMANENT RETENTION:** The records described under the following item or items have been appraised by the National Archives and Records Service (NARS) and are designated for permanent retention by the Federal Government. The agency will offer these records to NARS as specified in the schedule.

- ☐ 3. **DISPOSITION NOT APPROVED:** The records described under the following item or items are not approved for disposition. See Section III of this form for explanation.

- ☐ 4. **WITHDRAWN:** The records described under the following item or items have been withdrawn at the request of the agency.

SECTION II - RECOMMENDATION/CONCURRENCES

	TITLE	SIGNATURE	DATE
4/28/81 APPRAISAL	APPRAISER	Debra Wallace Lecky	4-24-81
	DIRECTOR, RECORDS DISPOSITION DIVISION	Jean K. Fuley, Acting	4/27/81
CONCURRENCES			

SECTION III - APPRAISER'S COMMENTS

This job revises the section of NCI-146-77-1 which relates to the investigative program at the Office of Personnel Management. Concurrence by NMF is not necessary because the records were previously authorized for disposal.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INVESTIGATIONS This grouping of records consists of documents relating to the Government-wide investigative program. 1. Investigative Case Files. a. Record copies of reports and related papers maintained in the ~~Division of Personnel Investigations (DPI)~~ <i>Division of Personnel Investigations (DPI)</i> b. Copies of reports, related papers, and investigator notes retained in Regional Investigations Division (RID), ~~including Investigative Worksheet Branch (IWB)~~ (1) Copies of region of origin cases. (2) Copies of participating region cases. (3) Copies of spot checks, personal confidential inquiries, and personal record searches. (4) Copies of political activity, and other special types of investigative cases. c. Bar and Flag Files, excluding medical flags. (1) Record copies of closed cases resulting in debarment or flagging. ~~(2) Regional office copies of closed cases which result in debarment or flagging.~~ 2. National Agency Check and Inquiry Case Files; includes inquiry forms, results of National Agency Checks, and related case papers. <i>Investigative Support Branch (ISB)</i> a. Files marked "Clear - file retained in region for destruction" under instructions in FPM Supplement 736-72 (Internal). <i>DPI</i> b. Files marked "File to #4" under instructions in FPM Supplement 736-72 (Internal). <i>Investigative Support Branch</i> 3. Security Investigations Index (SI), ~~central office~~ <i>central office</i> index to personnel investigations.	Break closed cases annually. ~~Transfer to WHRC 5 years after break. Destroy when 40 years old.~~ <i>15</i> <i>and destroy after</i> Break closed cases <i>every</i> 3 months. ~~Destroy 3 months after break.~~ <i>and destroy after</i> Break closed cases <i>every</i> 3 months. ~~Destroy 3 months after break.~~ <i>and destroy after</i> Break closed cases <i>every</i> 3 months. ~~Destroy 3 months after break.~~ <i>and destroy after</i> Break closed cases <i>every</i> 3 months. ~~Destroy 3 months after break.~~ Break closed cases annually. ~~Transfer to WHRC 5 years after break. Destroy when 40 years old.~~ <i>15</i> ~~Break closed cases every 3 months. Destroy 3 months after break.~~ <i>and destroy after 3 months</i> Break closed cases, ~~monthly~~ <i>monthly</i>. ~~Destroy 3 months after break.~~ Break closed cases annually. Transfer to WHRC 5 years after break. Destroy when ~~40~~ <i>15</i> years old. ~~When an investigation file is not maintained, remove from active file - date of final action and put in "Disclosure Accounting" file for additional 5 years, then destroy. Remove all other cards from active files 20 years after the date of final action and destroy.~~ <i>15</i>

3.14v.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. <i>(National Office (DPI))</i> ~~a. Control Office (DPI)~~ <i>Investigations Washington Branch (IWB)</i> ~~b. Washington Division of Investigations (WDI) and~~ RID.	Break closed cards annually. Destroy ~~4~~ years after break. <i>and destroy ~~after~~ 3 months.</i> Break ~~closed~~ cards ~~and annually~~ ~~Destroy 6 months after break.~~
5.	Desk Case Control File; card record of pending cases maintained by deadline date in ~~OPF, WOI~~ and RID. <i>DPI, IWB</i>	Destroy when case is closed.
~~6.~~	~~Investigations Security Reference File.~~	~~Destroy upon completion of program.~~
~~7.~~	~~Loyalty Conversion to FBI and Record of Processing FBI Investigation File (in Form 131, or equivalent).~~	~~Break annually. Destroy 2 years after break.~~
~~8.~~	Regional office evaluation reports.	Break annually. Destroy ~~2~~ years after break.
~~9.~~	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
~~10.~~	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
~~11.~~	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of ~~case~~ investigative file, or destroyed if investigative file belongs to another agency.
~~12.~~	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
~~13.~~	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
~~14.~~	~~Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FBI Supplement (Internal) 736-22.~~	~~Break annually. Destroy 3 years after break.~~
~~15.~~	~~OPM Form 2799, or equivalent, Daily Report of Investigator.~~	Break quarterly. Destroy no later than one year after break.
~~16.~~	Security program workload report.	Break annually. Destroy 1 year after break.
~~17.~~	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 4

November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
10-15	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
10	~~Relocation File: folders containing duplicate information relating to personnel investigation and adjudications which warrant retention at a relocation site for use in the event of a national emergency.~~	~~Transfer to relocation site when sufficient number available.~~

AM Supplement 44-3

Inst. 4

November 1977
March 1981

Question 3. Additional information in disposal dossier

Listed below is the information maintained in the disposal dossier in the Records Disposition Division Office. A copy of each item is enclosed.

1. House Report 1203, 86th Congress, 2d Session, showing Congress' concurrence in NARS Disposition Job No. II-NNA-3152. Also, correspondence from the Joint Committee on the Disposition of Executive Papers, 89th-90th Congresses, describing their review procedures (letters dated March 1, 1965; July 28, 1965; and May 1, 1967).
2. Annotated SF 135 and accompanying documents showing disposition of CSC investigative case files transferred to the Federal Records Center pursuant to NARS Disposition Job No. II-NNA-3152.
3. Excerpt from CSC Administrative Manual Supplement (AMS) 178-D, issued May 7, 1962, relating to investigative records. See items 1(a) and 2A especially. AMS 178-D incorporated the disposition standards approved in II-NNA-3152.
4. CSC reply to letter of Senators Thurmond and Eastland dated March 1, 1978. CSC reply is dated March 13, 1978.
5. NARS Disposition Job No. NCI-146-78-3: a "one-time" disposal request made by CSC and approved by the Archivist on February 28, 1978, but not implemented due to the agreement between CSC and the Judiciary Committee reached in the exchange of letters dated March 1 and 13, 1978 (see item 4 above). Also, related correspondence dated February 17, 1978 - November 3, 1980 (6 items).
6. SF 135 describing the security investigative index cards transferred to the Washington National Records Center, September 29, 1975.
7. Correspondence between CSC and NARS concerning access to the case files and index cards stored at WNRC (2 letters dated April 22, 1976 and May 3, 1978).
8. Privacy Act Notice, November 25, 1980, describing CSC Personnel Investigations Records. Extracted from the Federal Register, vol. 4, no. 229, pp. 78407-78410.
9. Federal Personnel Manual Bulletin 732-4, dated October 10, 1980, proposing a reduction in retention of investigative files from 20 to seven years.

DISPOSITION OF SUNDRY PAPERS

JANUARY 18, 1960.—Ordered to be printed

Mr. THOMPSON of New Jersey, from the Joint Committee on Disposition of Executive Papers, submitted the following

REPORT

[Pursuant to 59 Stat. and 63 Stat.]

The joint select committee of the Senate and House of Representatives, appointed on the part of the Senate and House of Representatives and acting in compliance with the provisions of the act approved July 7, 1943 (57 Stat. 380), as amended by the act approved July 6, 1945 (59 Stat. 434) and the act approved June 30, 1949 (63 Stat. 377), respectfully reports to the Senate and House of Representatives that it has received and examined the report of the Archivist of the United States No. 60-7, dated January 11, 1960, to the 86th Congress, 2d session, submitting the following lists or schedules covering records proposed for disposal by the Government agencies indicated:

Job No.	Agency by which submitted	Job No.	Agency by which submitted
II-NNA-3035...	Department of the Interior.	II-NNA-3134...	Department of the Air Force.
II-NNA-3092...	Department of the Air Force.	II-NNA-3135...	Post Office Department.
II-NNA-3101...	Do.	II-NNA-3136...	Department of Justice.
II-NNA-3102...	Do.	II-NNA-3137...	Federal Power Commission.
II-NNA-3103...	Do.	II-NNA-3138...	Department of the Air Force.
II-NNA-3105...	Veterans' Administration.	II-NNA-3139...	Do.
II-NNA-3107...	Department of the Air Force.	II-NNA-3140...	Do.
II-NNA-3110...	General Services Administration.	II-NNA-3142...	Do.
II-NNA-3111...	Department of State.	II-NNA-3146...	Administrative Office of the U.S.
II-NNA-3118...	International Cooperation Administration.		Courts.
II-NNA-3119...	Department of the Army.	II-NNA-3147...	Department of the Air Force.
II-NNA-3121...	Housing and Home Finance Agency.	II-NNA-3149...	Do.
II-NNA-3122...	Department of Justice.	II-NNA-3151...	Tennessee Valley Authority.
II-NNA-3124...	Department of the Air Force.	II-NNA-3152...	Civil Service Commission.
II-NNA-3126...	Board of Governors of the Federal Reserve System.	II-NNA-3153...	Department of Justice.
II-NNA-3128...	Department of the Air Force.	II-NNA-3156...	U.S. Information Agency.
II-NNA-3129...	Do.	II-NNA-3158...	Post Office Department.
II-NNA-3132...	Do.	II-NNA-3161...	Department of the Air Force.
II-NNA-3133...	Do.	III-NNR-204...	General Services Administration.
		III-NNR-269...	Do.
		III-NWR-323...	Do.

DISPOSITION OF SUNDRY PAPERS

Your committee reports that the records proposed for disposal in the said lists or schedules reported by the Archivist of the United States do not, or will not after the lapse of the period specified, have sufficient administrative, legal, research, or other value to warrant their continued preservation by the Government and recommends that their disposal be accomplished subject to the proviso of section 6 and the provisions of section 9 of the aforementioned act, as amended.

Respectfully submitted to the Senate and House of Representatives.

FRANK THOMPSON, Jr.,

WILLARD S. CURTIN,

Members on the Part of the House.

OLIN D. JOHNSTON,

FRANK CARLSON,

Members on the Part of the Senate.

Johnston J.S.C.
Johnston J.S.C.
Rept
1/18/60

Mr. ~~Rampson~~ of New Jersey, from the Joint Committee on Disposition of Executive Papers, submitted the following

REPORT

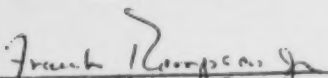
The joint select committee of the Senate and House of Representatives, appointed on the part of the Senate and House of Representatives and acting in compliance with the provisions of the act approved July 7, 1943 (57 Stat. 380), as amended by the act approved July 6, 1945 (59 Stat. 434) and the act approved June 30, 1949 (63 Stat. 377), respectfully reports to the Senate and House of Representatives that it has received and examined the report of the Archivist of the United States No. 60-7, dated January 11, 1960, to the 86th Congress, 2d session, submitting the following lists or schedules covering records proposed for disposal by the Government agencies indicated:

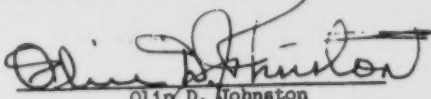
Job No.	Agency by Which Submitted
II-NNA-3035	Department of the Interior
II-NNA-3092	Department of the Air Force
II-NNA-3101	Department of the Air Force
II-NNA-3102	Department of the Air Force
II-NNA-3103	Department of the Air Force
II-NNA-3105	Veterans Administration
II-NNA-3107	Department of the Air Force
II-NNA-3110	General Services Administration
II-NNA-3111	Department of State
II-NNA-3118	International Cooperation Administration
II-NNA-3119	Department of the Army
II-NNA-3121	Housing and Home Finance Agency
II-NNA-3122	Department of Justice
II-NNA-3124	Department of the Air Force
II-NNA-3126	Board of Governors of the Federal Reserve System
II-NNA-3128	Department of the Air Force
II-NNA-3129	Department of the Air Force
II-NNA-3132	Department of the Air Force
II-NNA-3133	Department of the Air Force
II-NNA-3134	Department of the Air Force
II-NNA-3135	Post Office Department
II-NNA-3136	Department of Justice
II-NNA-3137	Federal Power Commission
II-NNA-3138	Department of the Air Force
II-NNA-3139	Department of the Air Force
II-NNA-3140	Department of the Air Force
II-NNA-3142	Department of the Air Force
II-NNA-3146	Administrative Office of the United States Courts
II-NNA-3147	Department of the Air Force
II-NNA-3149	Department of the Air Force
II-NNA-3151	Tennessee Valley Authority

<u>Job No.</u>	<u>Agency by Which Submitted</u>
II-NNA-3152	Civil Service Commission
II-NNA-3153	Department of Justice
II-NNA-3156	United States Information Agency
II-NNA-3158	Post Office Department
II-NNA-3161	Department of the Air Force
III-NIR-294	General Services Administration
III-NNR-269	General Services Administration
III-NWR-323	General Services Administration

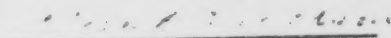
Your committee reports that the records proposed for disposal in the said lists or schedules reported by the Archivist of the United States do not, or will not after the lapse of the period specified, have sufficient administrative, legal, research, or other value to warrant their continued preservation by the Government and recommends that their disposal be accomplished subject to the proviso of section 6 and the provisions of section 9 of the aforementioned act, as amended.

Respectfully submitted to the Senate and House of Representatives.


 Frank Thompson Jr.


 Olin D. Johnston


 Willard S. Curtin


 Frank Carlson

Members on the Part of the House

Members on the Part of the Senate

Disposition of Executive Papers

GENERAL SERVICES ADMINISTRATION

Washington 25, D. C.



JAN 1 - 1960

Honorable Richard M. Nixon
President of the Senate
Washington 25, D. C.

My dear Mr. President:

Transmitted herewith is the report of the Archivist of
the United States on records proposed for disposal under
the law.

Sincerely yours

Christine E. Gleeck
Archivist

Enclosure

Disposal Report No. 60-7

January 11, 1960

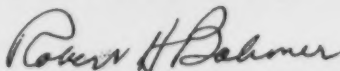
Report of the Archivist of the United States on records proposed for disposal in accordance with the provisions of the act approved July 7, 1943 (57 Stat. 380) as amended by the act approved July 6, 1945 (59 Stat. 434) and the act approved June 30, 1949 (63 Stat. 377).

In compliance with the provisions of section 4 of the act cited above, I am forwarding for transmission to Congress the following lists or schedules covering records proposed for disposal by the departments and independent agencies indicated:

<u>Job No.</u>	<u>Department or Independent Agency by Which Submitted</u>
II-NNA-3035	Department of the Interior
II-NNA-3092	Department of the Air Force
II-NNA-3101	Department of the Air Force
II-NNA-3102	Department of the Air Force
II-NNA-3103	Department of the Air Force
II-NNA-3105	Veterans Administration
II-NNA-3107	Department of the Air Force
II-NNA-3110	General Services Administration
II-NNA-3111	Department of State
II-NNA-3118	International Cooperation Administration
II-NNA-3119	Department of the Army
II-NNA-3121	Housing and Home Finance Agency
II-NNA-3122	Department of Justice
II-NNA-3124	Department of the Air Force
II-NNA-3126	Board of Governors of the Federal Reserve System
II-NNA-3128	Department of the Air Force
II-NNA-3129	Department of the Air Force
II-NNA-3132	Department of the Air Force
II-NNA-3133	Department of the Air Force
II-NNA-3134	Department of the Air Force
II-NNA-3135	Post Office Department
II-NNA-3136	Department of Justice
II-NNA-3137	Federal Power Commission
II-NNA-3138	Department of the Air Force
II-NNA-3139	Department of the Air Force
II-NNA-3140	Department of the Air Force
II-NNA-3142	Department of the Air Force
II-NNA-3146	Administrative Office of the United States Courts
II-NNA-3147	Department of the Air Force
II-NNA-3149	Department of the Air Force
II-NNA-3151	Tennessee Valley Authority

<u>Job No.</u>	<u>Department or Independent Agency by Which Submitted</u>
II-NNA-3152	Civil Service Commission
II-NNA-3153	Department of Justice
II-NNA-3156	United States Information Agency
II-NNA-3158	Post Office Department
II-NNA-3161	Department of the Air Force
III-NIR-294	General Services Administration
III-NWR-269	General Services Administration
III-NWR-323	General Services Administration

These lists or schedules have been carefully examined, and it appears to me that the records described in the items that are stamped with the words "disposal approved" do not, or will not after the lapse of the period specified, have sufficient administrative, legal, research, or other value to warrant their continued preservation by the United States Government.



Robert H. Bahmer
Acting Archivist of the
United States

Enclosures - 39

LAW-8

Standard Form No. 118
Revised November 1951
Prescribed by General Services
Administration
GSA Rev. 7-17-54

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION,
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON 25, D. C.

1. FROM (AGENCY OR ESTABLISHMENT)
U. S. Civil Service Commission

2. MAJOR SUBDIVISION
Central Office

3. MINOR SUBDIVISION
Investigations Division

4. NAME OF PERSON WITH WHOM TO CONFER
Carlton A. Gloyd

5. TEL. EXT.
5036

LEAVE BLANK	
DATE RECEIVED NOV 27 1959	JOB NO. U-NNA-3152
DATE APPROVED 12/17/59	CONGRESSIONAL AUTHORIZATION
HOUSE REPORT NO.	CONGRESS DATE
NOTIFICATION TO AGENCY CONGRESS HAS AUTHORIZED DISPOSAL OF ITEMS MARKED "FORMAL APPROVAL" IN COLUMN 2.	
(Date)	Archivist's Representative.

6. SIGNATURE OF AGENCY REPRESENTATIVE

7. The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated or on the occurrence of the event specified.

☐ A The records have ceased to have sufficient value to warrant further retention.

☒ B The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated or on the occurrence of the event specified.

D. F. Williams
(Signature of Agency Representative)

Director, Bureau of
Management Services

2. ITEM NO.	3. DESCRIPTION OF ITEM (WITH INCLUSIVE DATES OR RETENTION PERIODS)	4. SAMPLE OR FOR NO.	5. ACTION TAKEN
1.	Central Office Investigation Case Files: Reports on applicants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veterans' Preference Act of 1944 and under the security clearance program. The case files include the following: some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suitability and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive, qualification cases, and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except MACI's for nonsensitive positions where no derogatory information is found, which are disposed after 3 months). Cases contain papers giving the story of each investigation from original request or appeal to final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Appeals and Review, the Loyalty Review Board, and the Commission, are included. Destroy 30 years from date of last action. Transfer to Federal Records Center 5 years after date of last action. Destroy 25 years later NOTE: Due to the confidential nature of these papers, samples are not submitted but are available for inspection in Room 354, Civil Service Commission, 8th and F Streets, N. W.	Personal Approval 12/17/59	Personal Approval

Four copies, including original, to be submitted to the National Archives and Records Service

16-54229-2 GPO

APPRAISAL REPORT

Disposal Job No. II-NNA-3152

Approved:

Item 1, because these records have no appreciable value for historical or other research uses, and the Civil Service Commission has determined that neither it nor other agencies need them for administrative purposes for more than 30 years after the date of last action in a case. These investigation case files contain an overwhelming amount of minutiae on the fitness of about 2,000,000 persons for Federal employment.

There would be little possible research use to which they might be put which could not be met by other records which are being preserved. Official personnel folders, which have a long retention period, document the acceptance of an individual for Federal employment after investigation. The Federal Bureau of Investigation presently is retaining a copy of its report when it makes a full field investigation for the Commission in one of these cases.

Any policy matter relating to the Commission's investigation program that might be reflected in some of these case papers would be documented in correspondence files of the head of the Investigations Division or of the Civil Service Commission. The Commission also is retaining a master card index to its security investigations. This index covers all individuals, about 6,000,000 of them, investigated by the Civil Service Commission and other agencies since 1939, and some prior to 1939. The index serves also as a record, since each card contains for the individual named the date of the case, results of national agency checks, other data on the case, and such identifying information as social security number and date and place of birth. The Commission also is preserving narrative and statistical reports on its investigation program.

These other records of the Civil Service Commission that are being preserved contain sufficient information on the Commission's activities and functions in investigations concerning merit, suitability, and loyalty. The case files for which disposal authority is requested, therefore, need not be preserved permanently in order to document these activities and functions.

Appraised by: Hardee Allen 12/15/59
139. Hardee Allen

Approved for the Archivist: Thad S. Page 12/17/59
Thad S. Page
Chief Archivist
General Records Division

March 1, 1965

Mr. Herman Emerson
19403 Gilmore Street
Burbank, California

Dear Mr. Emerson:

U. S. Senator Olin D. Johnston, Ranking Member of the Joint Committee on Disposition of Executive Papers, has referred your recent request for information concerning the preservation and disposition of executive papers to this office for reply.

The statutes provide for the appointment of a Joint Committee of the two Houses to consider reports as to destruction of useless executive papers. The Joint Committee on Disposition of Executive Papers was established by statute in 1889. The statutes further provide that all proposed legislation concerning the disposition of executive papers shall be referred to this Joint Committee.

The Senate members are the chairman and ranking minority member of the Senate Committee on Post Office and Civil Service, and are appointed by the President of the Senate. The two House members are members of the Committee on House Administration and are appointed by the Speaker of the House of Representatives. The attached pamphlet will indicate the present membership of this joint committee.

Experts in the National Archives determine which executive papers should be retained permanently and which might well be discarded. These recommendations are made in a report to Congress. This report is referred to the Joint Committee on Disposition of Executive Papers. After due consideration, a report is filed with the Congress recommending that favorable action be taken on the recommendations of the National Archives and Records Service. The head of this service has kindly offered to send you information relative to the actual process involved in carrying out the mandate contained in the Federal statutes.

Sincerely yours,

Omer Burleson
Chairman

*Original request
with copy of
replies to
Senator Johnston
forwarded
10/24/64*

July 28, 1965

Mr. Nicholas A. Masters
Research Consultant
Joint Committee on the Organization
of the Congress
Room 5-146, U. S. Capitol

Dear Mr. Masters:

This is in response to your letter of July 27 concerning the Joint Committee on Disposition of Executive Papers and the Joint Committee on the Library.

Joint Committee on Disposition of Executive Papers

I serve as Clerk and only staff member of this group. The two House Members, one Democrat and one Republican, are named by the Speaker upon the recommendation of the Chairman of the Committee on House Administration. The President of the Senate appoints the two Senate members who are the Chairman and Ranking Minority Member of the Senate Committee on Post Office and Civil Service.

No chairman is named for this Joint Committee and no formal meetings have been held in recent years.

The method of operation involves periodic submission of lists of obsolete material from various agencies to the Joint Committee by the Office of Records Appraisals of the National Archives. Screening of the material and preparation of the lists are accomplished by the Agency involved and the National Archives. Upon receipt of the lists, they are examined, then forwarded to each Member of the Joint Committee for his inspection. If in order, the Member signs an appropriate report, which is filed in the Senate and in the House.

The function of this Joint Committee is routine with the screening and preparation of disposal lists being handled at this source through the Office of Records Appraisal. There has been no error complaint relative to disposals to my knowledge.

Mr. Nicholas A. Masters

page 2

July 28, 1965

Joint Committee on the Library

The Joint Committee on the Library is comprised of the Chairman, and four Members, two Democrats and two Republicans of the Committee on House Administration and Senate Committee on Rules and Administration. They are named by House and Senate Resolutions at the beginning of each Congress.

~~The Chairmanship and Chief Clerkship of this Joint Committee automatically rotate each year. The Chairman and Clerk of the House Administration Committee serve as Chairman and Chief Clerk of the Joint Committee the first Session of each Congress. The Chairman and Clerk of the Senate Committee on Rules and Administration serve as Chairman and Chief Clerk of the Joint Committee the second Session of each Congress. This first Session of the 89th Congress Mr. Burleson is Chairman and I am Chief Clerk of the Joint Committee on the Library. Next Session, these offices will be filled by Senator Jordan and Gordon Harrison.~~

The Joint Committee on the Library last met on July 23, 1963. No meetings or hearings were scheduled in 1964. No meetings have been scheduled to date for 1965.

I trust the above information will be helpful, and if there is anything further please feel free to call on me.

Sincerely,

Julian P. Langston
Clerk

#3 - Joint Com. on Disp. of Exec. Papers

May 1, 1967

Mrs. Della Taylor
Acquisition Assistant
State College of Iowa
Cedar Falls, Iowa 50613

Dear Mrs. Taylor:

This will acknowledge your letter of April 28 in which you request that the State College of Iowa be placed on our standing order list to receive all publications distributed by the Joint Committee on the Disposition of Executive Papers.

The nature of the work of the Joint Committee on the Disposition of Executive Papers is such that there is no necessity to publish hearings, reports or other type documents. The report of the Joint Committee to the Congress in connection with the disposition of documents appears from time to time in the Congressional Record.

With best regards, I am,

Sincerely yours,

Julian P. Langston,
Chief Clerk

STANDARD FORM 135
APRIL 1962
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 2-17-52

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.
61 A - 200

RECORD GROUP NO.
146

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

U. S. Civil Service Commission
8th & F Sts., N. W.
Washington 25, D. C.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

3. AGENCY OFFICIAL AUTHORIZED TO TRANSFER (Signature)

David P. Williams

TITLE

Director, Bureau of
Management Services

DATE

November 15, 1960

4. CUSTODIAN OF RECORDS IN TRANSFERING AGENCY (Name, address, and telephone number)

Mr. Pearley G. Buck
USCSC Investigations Division
4th & F Sts., N. W. Room 133P

Code 129

Ext. 3989

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Official OCID Reports of Investigations and all related case papers (as described in CSC AHS 178-C, October, 1960, "Investigations" Item 1a) composed of the following sub-series:

1. Main Alphabetical File. 1928 thru 6/30/59. Cases reopened subsequent to this date are withdrawn and incorporated into the current case files. Master Index located in C. O. Investigations Division.
2. Oversize Alphabetical Files. 1928 thru 6/30/59. Same as above and cross-referenced in 1 above.
3. Special File (fraud, collusion, embezzlement). Filed by state and city. 1918 thru 6/30/59. Names cross referenced in Master Index.

(SEE OTHER SIDE)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

See attached agreement

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) II-NNA-3152 Trans to
☐ NO FRC after 5 yrs. Destroy 25 yrs later.

8. CUBIC FEET OF RECORDS TRANSFERRED

19.985

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

None

10. SQUARE FEET OF SPACE RELEASED

Office
17,270

Storage

LOCATION

Temporary Bldg. D, 4th & Independence Ave., S.W.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EXCEPT INS. FURNISHED AT AGENCY					
RECORDS CHIPPED IN	1,056			4,383	
TO BE TURNED	393				

CUBIC FEET OF CHESTING LIMITED AT AGENCY.

DO NOT WRITE BELOW THIS LINE

11/2 19 60

THE FOLLOWING OR BIG RECORDS WERE RECEIVED:
SPRINKLED, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

Alfred Williams
Chief, Section & Disposal Section
Federal Bureau of Investigation
Bldg. 1, Alexandria, Virginia

61 A 200

U. S. GOVERNMENT PRINTING OFFICE 16-58120-1

19785-19798 (42 H.)

4. ~~Loyalty Files (119-2) Alphabetical by name of individual. 1917 thru 1941.~~

5. ~~Bar and Flag Cases, 103-1 thru 103-15725. 1915 thru 1941. Index located in the Central Files Unit of the Central Office. Numerical gaps represent cases carried forward to the Main Alphabetical File.~~

FBC boxes 19799-19985 disposed 4/72
(187 cu. H.)

FBC boxes 19785-19798 disposed 9/72
(14 cu H.)

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington National Records Center
Washington, D.C. 20409



DATE: JUN 16 1972

REPLY TO: Chief, Accession and Disposal
ATTN OF: Branch (NCWA), Stop 386
SUBJECT: Disposal Clearance

Mr. Willard M. Wilson

LOCATION 03-51-30-3
NEW LOCATION
SHIFT ACC: YES NO
FULFILL BY: [Signature]
CHECKED BY: [Signature]
DATE: 9-19-72

The records described below are eligible for disposal 7/72.

Accession No. 61A200	Cu. Ft. 14	Record Group No. 146
Disposal Authority 3 INV.01, Item 1 (a)		
Description of Records Loyalty Files (119-2) Alphabetical by name of individual. 1917-1941		
FRC boxes 19785 - 19798	partial,	classified

This is to request your concurrence for disposal of the records described above. Please indicate your action by checking the appropriate box below, and return the original to us. If you do not concur in the scheduled disposal, please justify continued retention of the records and indicate the new disposal date.

☒ Approved	Give Justification on Reverse		New Disposal Date
	☐ Approved & Amended	☐ Disapproved	
Signature [Signature]	Title Chief Dir. of Program Planning & Mgmt. Chief Board Admin. Sec.	Date 7/17/72	

THE DESCRIBED RECORDS WILL BE
DISPOSED IN ACCORDANCE WITH FPMR
101-11.610-9(b) IF NO REPLY IS
RECEIVED WITHIN 30 CALENDAR
DAYS FROM DATE ON LETTER

Keep Freedom in Your Future With U.S. Savings Bonds

GSA FORM JUL 68 7015

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington National Records Center
Washington, D.C. 20409



DATE: February 29, 1972
REPLY TO: Chief, Accession and Disposal
ATTN OF: Branch (NCWA), Stop 386
SUBJECT: Disposal Clearance

Mr. Willard M. Wilson
Chief, Records Admin. Section
Office Services Division
Civil Service Commission
Room 7422, FOB9
227

LOCATION 03-51-30-3
NEW LOCATION _____
SHIFT ACC: _____ YES _____ NO _____
PULLED BY W. H. A.
CHECKED BY W. H. A.
DATE 3/4/72

The records described below are eligible for disposal immediately.

Accession No. 61A200	Cu. Ft. ~ <u>187</u>	Record Group No. 146
Disposal Authority CS 178-D 3, INV.02 item 1 (c) (1)		
Description of Records Bar & Flag cases 103 cases, 1915 - 1941 <u>1979-1985</u> FRC boxes <u>1525-1581</u> partial classified		

This is to request your concurrence for disposal of the records described above. Please indicate your action by checking the appropriate box below, and return the original to us. If you do not concur in the scheduled disposal, please justify continued retention of the records and indicate the new disposal date.

☒ Approved	Give Justification on Reverse		New Disposal Date
	☐ Approved as Amended	☐ Disapproved	
Signature <u>Forster P. H. Harte</u>	Title <u>Chief of Program</u>	Date <u>3/24/72</u>	
<u>W. H. A.</u>		<u>Chief Records Admin OSD 3-27-72</u>	

178 - D

CSC ADMINISTRATIVE MANUAL SUPPLEMENT**UNITED STATES CIVIL SERVICE COMMISSION****DISPOSITION OF RECORDS**

UNITED STATES CIVIL SERVICE COMMISSION
ADMINISTRATIVE MANUAL SYSTEM
SUPPLEMENT TRANSMITTAL

AM SUPP. NO. 178-D
 TRANSMITTAL NO. 1

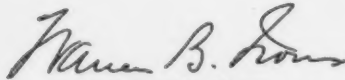
AM SUPPLEMENT NO. 178-D
 Disposition of Records

Washington 25, D. C.
 May 7, 1962
 MOR:EJA:rm

TABLE OF CHANGES

REMOVE		INSERT	EXPLANATION OF CHANGES
PAGE	IDENTIFICATION	PAGE	

This is a new AM Supplement which replaces AM Supplement 178-C, "CSC Records Control Schedule" (formerly Handbook S-514). The scope and applicability of the AM Supplements covering the CSC Records Management Program are discussed in the "Foreword" of this Supplement (page 1).



Warren B. Irons
 Executive Director

DISTRIBUTION: AM Supplement No. 178-D

CSC CODE: 178 "Paperwork Management"

PART III

CSC RECORDS SCHEDULES

The CSC Records Schedules contain the disposition instructions to be applied to specific series of records. To facilitate the application of these schedules in an orderly and systematic manner, records should be

- a. separated and maintained in record and non-record categories,
- b. "broken" periodically, and
- c. filed in accordance with the standards set forth in AM Supplement 178-C.

To aid in locating specific schedules, Part III of this Supplement has been assembled as follows:

- a. Functional Checklist - The checklist relates the functional classification to the three letter code used to index the individual pages (i.e., ADM - Administrative Management; APP - Appeals).
- b. Index - The alphabetical index refers the user to the functional category in which a series of records may be found.
- c. Records Schedules - These schedules describe the records in detail and give the disposition instructions applicable to each individual record series.

Section .01

FUNCTIONAL CHECKLIST OF CSC RECORDS SCHEDULES

ADMINISTRATIVE (HOUSEKEEPING) RECORDS

(Collections which are common to all organizational units)

ADM	ADMINISTRATIVE MANAGEMENT
ADS	ADMINISTRATIVE SERVICES
BUF	BUDGET AND FISCAL
COM	COMMITTEE MANAGEMENT
INF	INFORMATION SERVICES
PER	PERSONNEL (CSC)

SUBSTANTIVE (PROGRAM) RECORDS

(Specialized Program and Operating Records)

APP	APPEALS
CLC	CLASSIFICATION AND COMPENSATION
EDU	EMPLOYEE DEVELOPMENT AND UTILIZATION
ERS	EMPLOYEE RELATIONS AND SERVICES
EMP	EMPLOYMENT
EXR	EXAMINING AND RECRUITMENT
INP	INSPECTION
INS	INSURANCE
INV	INVESTIGATIONS
MED	MEDICAL
LEG	LEGAL
RET	RETIREMENT
SPC	SPECIAL CATEGORIES
VET	VETERAN SERVICES

NOTE: For convenience of use, the schedules included in Section 3 of this Supplement are arranged in alphabetical order, regardless of their basic functional coverage -- either administrative or substantive.

TR 5

3. INV. 01

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
	INVESTIGATIONS This functional grouping of records consists of collections of reports, indexes, case files, etc., relating to the administration and appraisal of the Government-wide investigative and suitability-rating programs; reports of Loyalty Review Board or Security Hearing Boards; training of investigators, etc. SEE: LEG for Hatch Act cases; COM for management of Boards.		
1	Investigative case files: Includes investigative reports and all related case records. (a) Record copies of reports and related papers. Files retained in BPI. (b) Copies of reports, related papers, and investigator notes retained in RID. (1) copies of region of origin cases (2) copies of participating region cases (i.e. cases originated in other regions or BPI). (3) copies of spot checks, personal confidential inquiries, and personal record searches.	Temporary Nonrecord Nonrecord Nonrecord	Transfer to Federal Records Center 5 years after date of closing action. Destroy 25 years after transfer (except those designated by Archives for permanent retention). Destroy 6 months after case is closed. See FPM Supp. (Int.) 736-72 for detailed disposition instructions. Destroy 6 months after case is closed. Destroy 6 months after case is closed.

AM Supplement 178-D

September 1964

3. INV. 02

TR 5

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
	Item 1 (b) cont'd.		
	(4) copies of postmaster, rural carrier, political activity, and other special types of investigative cases.	Nonrecord	Destroy 6 months after case is closed.
	(c) Bar and flag files, excluding medical flags.		
	* (1) copies of closed cases resulting in debarment or flagging.	Temporary	Transfer to Federal Records Center 5 years after date of closing action. Destroy 25 years after date of transfer. *
	(2) regional office copy of closed cases which resulted in debarment or flagging.	*Nonrecord*	Destroy 6 months after case is closed.
* 2 (DELETED)			
2A	Security Investigations Index: Central office index to personnel investigations made by the CSC. (Includes records of personnel investigations made by agencies since 1939, records of CSC bar and flag action investigations and material formerly identified as the central office Master Index.)	Permanent	Disposal not authorized. Retain for reference use.
2B	Investigations Locator File: Card index to pending and recently closed investigations maintained in RID and WDI.	Nonrecord	Break semiannually beginning July 1, 1964. Destroy 6 months after break. *
3	Case Control File: Card record maintained by deadline date, in RID and WDI.	Temporary	Destroy when case is closed, unless card is filed in SII per FPM Supp. (Int.) 736-72.

September 1964

AM Supplement 178-D

FB-1

3. INV. 03

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
4	Record Check and Inquiry Case Files: Confidential inquiry forms, results of record checks, and related case papers (a) Files marked "Clear--file retained in region for destruction" under instructions in FPM Supplement 736-72 (Int) (b) Files marked "File to COID" under instructions in FPM Supplement 736-72 (Int). Files maintained in COID.	Temporary	Destroy 3 months after case is closed.
5	Investigations Reference File	Permanent	Disposal not authorized. Retain for reference use.
6	FBI Material Received File: INV Form 176, or equivalent	Permanent	Disposal not authorized. Retain for reference use.
7	Letters of instruction to investigators, including requests from investigators for specific instructions	Temporary	Break annually. Destroy 1 year after break.
8	Loyalty Conversion File: INV. Forms 131, 131A, and 131B, or equivalent	Non-record	Destroy after retention for 2 years.
9	Loyalty Investigations Control File: SF 79 and CSC Form 3746, or equivalent	Permanent	Disposal not authorized. Retain for reference use.
10	Release of Information Control File: INV. Form 138, or equivalent	Non-record	Destroy after retention for 1 year.
11	Request for Confidential Files: INV. Form 7, or equivalent	Non-record	Destroy 60 days after completion of request.

AM Supplement 178-D

May 1962

3. INV. 04

TR-1

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
12	Reports of arrest records received from the Federal Bureau of Investigation on persons regarding whom there is no record of present Federal employment and no previous investigative file, in which the record is not serious enough to warrant flagging	Temporary	Break quarterly. Destroy 3 months after break.
13	Reports of Inspection of Regional Office Investigations Division (C.O. Investigations Division)	Temporary	Destroy 2 years after date of report.
14	Security Investigation Lead File (Scheduling) Index to private firms that maintain personnel records	Permanent	Disposal not authorized. Retain for reference use.
15	INV. Forms 254A and 254B - Certifications from Atomic Energy Commission showing receipt of completed reports of investigation	Non-record	Destroy 1 year after end of fiscal year in which the report was approved.
16	Copies of CSC Form 3746, Investigations Information Card, or equivalent, used in Regional Office Examining Division	Non-record	Purge annually. Destroy in accordance with instructions in FPM Supp. 736-72 (Int).
17	Policy and Procedure Files of the Loyalty Review Board	Permanent	Disposal not authorized. Retain for reference use.
18	Lawsuits: Case files containing briefs, opinions, memoranda, etc., on lawsuits involving the Loyalty Review Board	Permanent	Disposal not authorized. Retain for reference use.

May 1962

AM Supplement 178-D

TR-1

3 INV. 05

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
19	Control Index: Card index containing skeletal information of basic data on all cases processed under the Federal Employee Loyalty Program (a) Alphabetical Index (b) Statistical Card File	Permanent Permanent	Disposal not authorized. Retain for reference use. Disposal not authorized. Retain for reference use.
20	Statistical Data Files consisting of processed copies of statistical summary reports prepared in the Loyalty Review Board and statistical reports received from Regional and agency boards (a) L.R.B. retains 2 copies of each statistical summary report	Permanent	Disposal not authorized. Retain for reference use.
21	Loyalty Review Board Memoranda consisting of original drafts, and processed copies, of formal Loyalty Review Board memoranda to all Regional and agency Loyalty Boards covering policies, procedures and instructions (a) L.R.B. original signed drafts (b) Regional Area Offices (Processed copies) (c) All other processed copies	Permanent Non-record Non-record	Disposal not authorized. Retain for reference use. Retain one current set for reference use. Maintain a minimum supply sufficient for operating purposes.

3. INV. 06

TR-1

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	CLASS	AUTHORIZED DISPOSITION
22	Regulations and Advisory Files consisting of membership lists of Regional and agency Loyalty Boards and correspondence pertaining thereto, copies of agency issuances concerning the adjudication of loyalty cases, preliminary drafts of material for the Federal Register, FPM, OPM and the Boards' budget working papers	Permanent and Non-record	Review annually. Destroy all non-record material of no further administrative value. Retain permanent material for reference use.
23	CSC, DI, and INV forms and other irrelevant or duplicate material used in connection with the routine processing of Investigative Case Files	Non-record	Destroy when assembling new or reassembling old case files.
24	Regional Office Temporary File on SSD cases established in accordance with instructions contained in Commission Letter No. 55-18, Supplement No. 27	Temporary	Start new file each fiscal year. Destroy 3 years after the end of the fiscal year in which the case was scheduled.
25	CSC Form 2799, Daily Report of Investigator, or its equivalent, excluding those used in lieu of bi-weekly employee work reports as provided in Commission Letter No. 57-57	Non-record	Break quarterly. Destroy after appropriate review and compilation of statistics. Maximum retention: Three months after date of submission.
26	Security program workload, Report	Temporary	Break annually. Destroy 1 year after date of report.

May 1962

AM Supplement 178-D

*Commission's Reply to Eastland's memo dated
by Council Some Contact*

113

Honorable Strom Thurmond
Committee on the Judiciary
United States Senate
Washington, D. C. 20510

Dear Senator Thurmond:

The letter of March 1, 1975, from you and Senator Eastland, requests that we postpone taking any action with respect to the index to the Security Research Files and the Files themselves until Congress has had an opportunity to consider the matter and make a finding.

The dismantling and destruction of the index was approved by the Commission in September, 1975, just prior to the effective date of the Privacy Act of 1974. While the index has not been used subsequent to September 27, 1975, it could not be destroyed because of the moratorium on the destruction of records imposed by Senate Resolution 21, of January 27, 1975. This moratorium was lifted on December 21, 1977, and we were preparing to dispose of the index as well as the source material.

In our judgment the index does not meet the standards of relevancy, accuracy, and timeliness required by the Privacy Act of 1974, and its continued use would violate Section (e)(7) which provides that an agency shall maintain no record describing how an individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual about whom the record pertains, or unless pertinent to and within the scope of an authorized law enforcement activity.

The attached decision of the court in Gang v. U.S. Civil Service Commission represents the consequences that attach both to the maintenance of untimely information and information pertaining to the exercise of First Amendment rights. Nevertheless, we will not destroy or dispose of the index or source material pending further discussion with your staff.

Civ. Act. No. 76-1263

(PDC. May 10, 1977)

Exemption to "Agency"

I would also hope that our respective staffs could discuss the broader issues set forth in your letter to assure a proper understanding of what we interpret as the impact of the Privacy Act of 1974 on the Federal Employee Loyalty/Security Program.

To arrange for further discussion please have someone on your staff contact Robert J. Drummond, Jr., telephone 635-6161.

Sincerely yours,

(Signed) Alan K. Campbell

Alan K. Campbell
Chairman

Enclosure

INP:ECAveritt:cm
3/10/78

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20400

1. FROM (AGENCY OR ESTABLISHMENT)

U.S. Civil Service Commission

2. MAJOR SUBDIVISION

Bureau of Management Services

3. MINOR SUBDIVISION

Office Services Division

4. NAME OF PERSON WITH WHOM TO CONFER

Charles E. Chesek

5. TEL. EXT.

632-4510

6. CERTIFICATE OF AGENCY REPRESENTATIVE:

LEAVE BLANK	
DATE RECEIVED: 29 FEB 1978	JOB NO. 78 3
NOTIFICATION TO AGENCY	
In accordance with the provisions of 44 U.S.C. 3302a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "with-drawn" in column 20.	
2-28-78	James A. Choudhury
(Date)	Archivist of the United States

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of Disposal are not required for the immediate future, and will not be needed after the retention periods specified.

2/23/78
Donald J. Maglin
Signature of Agency Representative

Director, Bureau of Mgt. Services

7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
14	The present retention requirement for investigative files is 20 years. The files in Accession 61A-200 (Alpha Files 1928-6/30/59) would not be disposable as a block until 1980. However, the largest portion of records in this Accession would fall within the retention period and be disposable. Since the records do not have sufficient administrative value to the Commission, the cost of purging material eligible for destruction would not be justified. It is therefore requested that the whole of Accession 61A-200 be disposed immediately. In our annual review of retention periods we will look at the feasibility of reducing the present retention period of 20 years on Investigative Case Files.	61A-200 AK 1-146-77-1 item 1A (INV)	

sent to agency. NNF & NCW - 3/2/78

STANDARD FORM 115
Revised January 1973
Prescribed by General Services
Administration
FPMR (41 CFR) 101-11.4

March 3, 1978

Honorable Birch Bayh
Chairman
Select Committee on Intelligence
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with your request to the Archivist of the United States of December 21, 1977, we are furnishing your committee with a copy of the enclosed records disposition request (Disposition Job No. NC1-146-78-3), which has been approved by the Archivist. This request, received from the Civil Service Commission, appears to cover records which may be relevant to your committee's oversight of Government operations with respect to intelligence activities.

Sincerely,

Walter W. Stender

WALTER W. STENDER
Assistant Archivist for
Federal Records Centers

Enclosure

OFFICIAL FILE:NC
DAY FILE:NC
DLEAHY:mg:3-3-78

cc: NC1-146-78-3

APPRAISAL REPORT ON DISPOSITION OF RECORDS	DATE	JOB NUMBER
	2-24-78	MC1-146-78-5

SECTION I - APPROVED FOR DISPOSAL

ITEM(S) FOR WHICH DISPOSAL AUTHORITY IS REQUESTED, IS (ARE) DISPOSABLE BECAUSE IT DOES (THEY DO) NOT HAVE SUFFICIENT VALUE FOR PURPOSES OF HISTORICAL OR OTHER RESEARCH, FUNCTIONAL DOCUMENTATION, OR THE PROTECTION OF INDIVIDUAL RIGHTS TO WARRANT PERMANENT RETENTION BY THE FEDERAL GOVERNMENT.

Item 1.

GENERAL ACCOUNTING OFFICE CONCURRENCE

N/A

☐

SEE COMMENTS OR ATTACHED LETTER.

SECTION II - APPROVED FOR PERMANENT RETENTION

ITEM(S) THAT IS (ARE) APPROVED FOR PERMANENT RETENTION, FOR THE REASONS INDICATED IN SECTION VII. THE AGENCY WILL OFFER THESE RECORDS TO THE NATIONAL ARCHIVES AND RECORDS SERVICE AS SPECIFIED IN THE SCHEDULE.

SECTION III - APPROVED FOR DISPOSAL AFTER CONVERSION TO MICROFORM

ITEM(S) FOR WHICH DISPOSAL AUTHORITY IS REQUESTED, IS (ARE) DISPOSABLE BECAUSE THE RETAINED MICROFORM IS AN ADEQUATE SUBSTITUTE FOR THE ORIGINAL RECORDS. THE AGENCY CERTIFIES COMPLIANCE WITH THE STANDARDS SET FORTH IN FPMR 101-11.504.

SECTION IV - DISPOSAL NOT APPROVED

ITEM(S) THAT IS (ARE) NOT APPROVED FOR DISPOSAL AT THIS TIME. THE AGENCY WILL RESUBMIT THIS (THESE) ITEM(S) WHEN SUFFICIENT INFORMATION IS AVAILABLE TO DETERMINE THE VALUE OF THESE RECORDS FOR AGENCY AND ARCHIVAL PURPOSES. IF NOT RESUBMITTED WITHIN SIX MONTHS NARS WILL CONTACT THE AGENCY.

SECTION V - WITHDRAWN

ITEM(S) THAT HAS (HAVE) BEEN WITHDRAWN AT THE REQUEST OF THE AGENCY.

SIGNATURE OF APPRAISER

Debra W. Leahy *Debra W. Leahy*

27 Feb 78

DATE

2-24-78

SECTION VI - APPROVAL/CONCURRENCES

APPROVAL

DIRECTOR, RECORDS DISPOSITION DIVISION

Thomas J. Waller

DATE

2/24/78

DATE

CON-

CURRENCES

DATE

DATE

SECTION VII - APPRAISER'S RECOMMENDATION

COMMENTS:

February 24, 1978

NCD

NCL-146-78-3

Director, NCD

*144
27 Feb 78*

The Civil Service Commission requests a one-time disposal authority for the immediate destruction of 19,784 cu. ft. of investigative case files, 1928-FY 59, presently stored at WNRC (accession 61A200). The records consist of case files relating to routine personnel security investigations undertaken for Federal government agencies lacking their own investigative forces. Most of the files are already eligible for disposal. The remainder, which date from the late 1950s, are seldom requested under FOIA or the Privacy Act, according to CSC. Although scheduled for destruction when 20 years old (NCL-146-77-1, INV 1a), the records have not been destroyed on a timely basis because their alphabetical arrangement necessitates a costly and time-consuming screening process.

NCD has personally discussed these records with the directors of CSC's Bureau of Management Services and Bureau of Personnel Investigations and has been assured that the files no longer possess any administrative value for the agency.

Considering the routine nature of these records, I recommend that CSC's request for disposal be approved. Since this disposal job proposes only a reduction in retention period of certain records already appraised as temporary, it is not necessary to send the job to the Civil Archives Division for examination.

Please note that this disposal request has prompted CSC to consider the feasibility of reducing the retention period on all its investigative case files.

Debra W. Leahy

DEBRA W. LEAHY
Records Disposition Division

STANDARD FORM 135
APRIL 1958
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
GSA GEN. REG. NO.

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

61 A - 200
RECORD GROUP NO.
146

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C. submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

U. S. Civil Service Commission
8th & F Sts., N. W.
Washington 25, D. C.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

David F. Williams

TITLE

Director, Bureau of
Management Services

DATE

November 15, 1960

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

HCSC Investigations Division Code 129
Mr. Pearley O. Buck 4th & F Sts., N. W. Room 133F Ext. 3989

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Official COMD Reports of Investigations and all related case papers (as described in
GSC ANS 178-C, October, 1960, "Investigations" Item 1a) composed of the following
sub-series:

- ① Main Alphabetical File. 1928 thru 6/30/59. Cases reopened subsequent to this date are withdrawn and incorporated into the current case files. Master Index located in C. O. Investigations Division.
- ② Overseize Alphabetical Files. 1928 thru 6/30/59. Same as above and cross-referenced in 1 above.
- ③ Special File (fraud, collusion, embezzlement). Filed by state and city. 1918 thru 6/30/59. Names cross referenced in Master Index.

(SEE OTHER SIDE)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

See attached agreement

ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) II-XM-3152 Trans to
☐ NO FRC after 5 yrs. Destroy 25 yrs later.

7. CUBIC FEET OF RECORDS TRANSFERRED

19.985

8. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

None

9. SQUARE FEET OF SPACE RELEASED

Office 17.270

Storage

LOCATION

Temporary Bldg. D, 4th & Independence Ave., S.W.

10. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTYED AND RETAINED AT AGENCY					
RECORDS SHIPPED IN	2,056			4,333	
TO BE RETURNED	393				
CUBIC FEET OF SHELVING EMPTYED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

LOCATION IN FEDERAL RECORDS CENTER

HE ABOVE-DESCRIBED RECORDS WERE RECEIVED
HOLDINGS, DAMAGED CONTAINERS, ETC.

11/2 - 60

Building 1118, Box 11

Albert Whisney Floor 40, 24th Sec. 40, 125/5 Row
Chief, Acquisition & Disposal Section

SIGNATURE

TITLE

Bldg. 1, Alexandria, Virginia
61-A-200

U. S. GOVERNMENT PRINTING OFFICE 16-60131-1

February 17, 1978

Mr. Donald J. Biglin, Director
Bureau of Management Services
U.S. Civil Service Commission
Washington, DC 20415

Dear Don:

Confirming our discussion of February 15, 1978, on the termination of the moratorium on destruction on intelligence/investigative records, I enclose a copy of a letter dated December 21, 1977, from the Chairman of the Senate Select Committee on Intelligence. In response to the request contained in the letter, we forwarded to the Committee on January 16, 1978, copies of all records disposition requests approved since January 21, 1975, relating to intelligence/investigative records. We also are forwarding on a continuing basis copies of all records disposition requests that we approve in the future for intelligence/investigative records.

Sincerely,

THOMAS W. WADLOW
Director
Records Disposition Division

Enclosure

OFFICIAL FILE:NC
DAY FILE:NC

CC: CChenish

HWOLFINGER:lp:2/17/78

2/17/78
JSW 2/17/78



UNITED STATES CIVIL SERVICE COMMISSION
WASHINGTON, D.C. 20415

CSR 3/7/78
Heine 4/9/78
IN REPLY PLEASE REFER TO
72005
3/13/78
FOR REFERENCE
8 MAR 1978
copy to MEN
3/13/78

Mr. Thomas W. Wadlow, Director
Records Disposition Division
National Archives and Records Service
Washington, D.C. 20408

Dear Tom:

Since receiving approval of the Archivist to dispose of Accession 61A-200 (Alpha Files 1928-1959), we have been requested by the Senate Committee on Judiciary to withhold disposition of investigative records. Pending resolution of their request, I ask that you do not take any action to destroy Accession 61A-200.

We are also holding up our request to seek approval for the disposal of the Security Research and Analysis Name Index.

Sincerely yours,

Donald J. Biglin
Director
Bureau of Management Services

cc: Mr. Drummond, BPI
Mr. Bumgarner, WHRC

THE MERIT SYSTEM—A GOOD INVESTMENT IN GOOD GOVERNMENT

March 13, 1978

Subject: Civil Service Commission (CSC) Investigative Files (WERC Acc. No. 146-61A0200)

TO: Director, Records Disposition Division - RCD

FROM: Debra W. Leahy *WZ 3/13/78*

At your request I contacted Charles Chesek about the freeze on disposal of CSC investigative files. Chesek informed me that the Senate Subcommittee on Intelligence (under the Judiciary Committee) had written Robert J. Drummond, Jr., Director, Bureau of Personnel Investigations (BPI), a five-page letter, the last sentence of which stated, "Please do not destroy any investigative records." As a result of this request CSC froze WERC Acc. No. 146-61A0200.

According to Chesek, BPI believes that the Subcommittee's particular interest is BPI's organizational files and name files, not the investigative files. In responding to the Subcommittee's letter, BPI will ask for a clarification of the freeze on CSC investigative records. I informed Chesek of our willingness to furnish CSC with a letter explaining our interest in seeing that the approved schedule is promptly applied to WERC Acc. No. 146-61A0200.

Henry J. Wolf
 HENRY J. WOLFENBACH
 Records Disposition Division

December 22, 1978

Mr. Donald J. Biglin, Director
Bureau of Management Services
U.S. Civil Service Commission
Washington, DC 20415

Dear Mr. Biglin:

In your letter of March 8, 1978, to Tom Wadlow, Director of our Records Disposition Division, you stated that the Senate Committee on Judiciary requested the Commission to withhold disposition of investigative records. Pending resolution of this request, you asked that we not dispose of Accession 61A-200 at our Washington National Records Center (WNRC).

Accession No. 61A-200 consists of almost 20,000 cubic feet of personnel investigation files (1928-1959) that are eligible for disposal. These records are presently located in prime storage space at WNRC. We would appreciate knowing of your progress in resolving the Senate Committee's request to hold these records. If there is anything we can do to assist you in this matter please let us know.

Sincerely,

WALTER W. STENDER
Assistant Archivist for
Federal Records Centers

OFFICIAL FILE:NC
~~DAY FILE:NC~~
RHEISE:mg:12-22-78

cc: A
NCW
Mr. Chasek (CSC Records Officer)

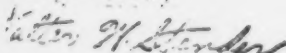
March 2, 1979

Mr. Edward Schroer, Director
Office of Management
Office of Personnel Management
Washington, DC 20415

Dear Mr. Schroer:

To date we have not received a response to our letter of December 22, 1978, to Mr. Donald J. Biglin (copy enclosed), relating to the 20,000 cubic feet of personnel investigations files (1928-1959) stored at our Washington National Records Center. We would appreciate hearing from you as soon as possible concerning the progress in resolving the problem raised by the Senate Committee on the Judiciary's request to retain these records. Since they are now eligible for disposal and are occupying sorely needed space at the Suitland Center, we would like to have this matter resolved as soon as possible.

Sincerely,



WALTER W. STENDER
Assistant Archivist for
Federal Records Centers

Enclosure

cc: Mr. Chesek (OPM Records Officer)

OFFICIAL FILE:NC

DAY FILE:NC

A

NCW

DEEABY:ala:3/2/79

November 3, 1980

Mr. C.R. Chesek
U.S. Civil Service Commission
Office Services Division, POB #9
Room B340
1900 E Street, NW
Washington, DC 20415

Dear Mr. Chesek:

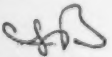
Nearly 20,000 cubic feet of CSC personnel security investigative files from the years 1928-1959 are currently stored at the Washington National Records Center in accession 146-61A200. I am writing to request approval for the immediate disposal of these files. Disposal of the accession was originally authorized by the CSC in 1978, but was deferred when you informed us that the Senate Judiciary Committee had requested continued retention of investigative files. We have not received notification since then of resolution of the Senate's request. Consequently, disposal action is still pending.

We are facing a severe shortage of storage space for new accessions and would appreciate your cooperation in disposal of these records, which are being held beyond their scheduled retention period. In view of OPM's recent proposal, in FPM Bulletin 732-4, to reduce the retention period for investigative files from twenty to seven years, I am confident that you share our concern to dispose of these files.

I also need your assistance in determining the volume of records to be retired to WNRC under accession 146-80-0002. In mid-1979, WNRC agreed to reserve 8,000 cubic feet of space for personnel security investigative files to be retired during FY 1980. To date, only 4,615 feet of these records have been received. Please let me know whether you intend to send the remaining 3,000 cubic feet of records in this accession, or if we can free the reserved space for other accessions.

If you have any questions, please call Jack Saunders on 763-7633. Your assistance in both of these matters is appreciated.

Sincerely,



CARLTON L. BROWN
Director, WNRC

cc:
Official File - NCW
Reading File - NCW
NCW:CLBrown:rms 11-3-80

No written response
received.

per telecon Jack Saunders 5/5/81

STANDARD FORM 135 JULY 1961 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		ACCESSION NO. 146-76-1		RECORD GROUP NO.	
		SIGNATURE		DATE RECORDS RECEIVED	
TITLE					
FROM: (Name and address of Agency transferring records) Civil Service Commission 1717 H Street, N.W. Washington, D. C. 20415		TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 20409			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY CSC Only					
2. SQUARE FEET OF SPACE CLEANED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE	B. STORAGE	A. FILE CABINETS (No.)	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	520
5. NAME OF AGENCY CUSTODIAN OF RECORDS CSC - Mr. Arthur J. Willis		6. BUILDING AND ROOM NO. CSC Room 814H		7. TELEPHONE NO. 202-632-6171	
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☐ NO					
9. AGENCY OFFICIAL (Signature)		10. TITLE		11. DATE	
12. BOX NUMBERS FRC ONLY AGENCY		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
LOCATION: 03/51:30-7 (6) VERIFIED: [] Schedule: N.V. 7-1-1 Shelving: N.V. 7-1-1		United States Civil Service Commission Bureau of Personnel Investigation <u>Security Investigative Index Cards</u> 1. Aab, Harold Augusta - Abel, Philip L. 2. Abel, Philip Wayne - Abrams, Gertrude Beatrice 3. Abrams, Gladys M. - Ackley, Nancy Eleanor 4. Ackley, Olaf F. - Adams, Charles Furman 5. Adams, Charles G. - Adams, John Cyril 6. Adams, John D. - Adams, Ronald Patrick 7. Adams, Sidney - Adkins, Anthony 8. Adkins, Anthony Neal - Agmata, Ricardo Aquilao 9. Agnalt, Theodore Trygoe - AhTop, Wilfred Edmund W. 10. Ahu, Osac A. T. - Akiyama, Yone 11. Akiyama, Yoshio - Albrecht, Ruth Ann 12. Albrecht, Sandra Lee - Aleman, Myretea Emilia 13. Aleman, Nellie Rocha - Alexander, Mary Ellen 14. Alexander, Mary Ellen - Alimorong, David Peter		INV 1 A 7/81	

STANDARD FORM 135-A PARTIAL EDITION GENERAL SERVICES ADMINISTRATION FORM (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission.	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FPC ONLY	AGENCY			
	15	Aliperta, Louis	-	Allen, David Owen
	16	Allen, David Walker	-	Allen, John Burnham
	17	Allen, John C.	-	Allen, Reame
	18	Allen, Thomas Bryant	-	Allison, Martha Jeane
	19	Allison, Martin D.	-	Alschuler, Robert Herbert
	20	Alston, Abraham	-	Alvear, Luis Armando
	21	Alveares, Pedro M.	-	Ames, Melvin S.
	22	Ames, E. Patricia	-	Anaya, Sam
	23	Anaya, Sara	-	Anderson, Berman
	24	Anderson, Brenda	-	Anderson, Dorothy Elisabeth
	25	Anderson, Edgar	-	Anderson, Izell
	26	Anderson, J. (I.O.)	-	Anderson, Louise Rose
	27	Anderson, Margaret	-	Anderson, Robert Lee
	28	Anderson, Roy	-	Anderson, William Dyer
	29	Anderson, William E.	-	Andrews, Gwendolyn J.
	30	Andrews, H.	-	Angell, Dwight
	31	Angell, Earl	-	Anthony, Byron A.
	32	Anthony, Daisy	-	Apotheker, J.
	33	Apovian, Edward	-	Arbon, V.
	34	Arbona, Carmen L.	-	Arenowits, Albert H.
	35	Arens, Alfred Klaus	-	Armour, John L.
	36	Armour, John Leroy	-	Armstrong, Roy Leroy
	37	Armstrong, Rubo Reid	-	Arnold, Joseph Arthur
	38	Arnold, Joseph Clyde	-	Arrington, Owen Warner
	39	Arrington, Pamela Diane	-	Ascherfeld, Arnold Edward
	40	Aschieris, Gus	-	Ashton, Joanne Catherine
	41	Ashton, Joanne M.	-	Athwal, Pritam Singh
	42	Athy, Charles Donald	-	Atwood, Arthur William
	43	Atwood, Baird Ewing	-	Aureus, Rebecca Gonzales
	44	Auricchio, Attilio L.	-	Autry, Edward Mansfield
	45	Autry, Elisabeth	-	Axtell, Ned
	46	Axtell, Paul Oren	-	Babbitt, Samuel
	47	Babbitt, Shirley Ann	-	Back, Lillian Virginia

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FORM (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
48		Back, Mable B.	- Baer, Maria	
49		Baer, Michael Angel	- Bailey, Charles F.	
50		Bailey, Clarence Wallace	- Bailey, Ozie	
51		Bailey, Palmer Erwin	- Baird, Ruth Marie	
52		Baird, Sally Lou	- Baker, Gary	
53		Baker, Gary Dean	- Baker, Norma Virginia	
54		Baker, Norman	- Balch, George	
55		Balch, Gerald Duane	- Balestrini, Victoria R.	
56		Balestrino, Carole Eve	- Ballard, Kuniko M.	
57		Ballard, L. B.	- Bamesberger, Ruby Rose	
58		Bamfield, Donald Ray	- Banks, Julius Ceasar	
59		Banks, June	- Barbacane, Richard Vincent	
60		Barbaro, Barbara Jean	- Barcroft, John Hill	
61		Barcroft, John Lester	- Barker, Homer Berten	
62		Barker, Homer, Ellis	- Barner, Phyllis Elaine	
63		Barner, Rethia Bell	- Barnes, Richard Albin	
64		Barnes, Richard Allen	- Barnhard, William J.	
65		Barnhardt, Ada Edith	- Barrera, Benude	
66		Barrera, Benito, P.	- Barron, Howard	
67		Barron, Howard Edward	- Barth, Bruce Howard	
68		Barth, Carl August	- Barth, Harold	
69		Barton, Harold Ellsworth	- Baskin, Yvonne	
70		Baskind, Albert Saul	- Batchelor, Samuel Clarence	
71		Batchelor, Stacy Lloyd	- Batson, Fred William	
72		Batson, Frederick L.	- Bauer, Lynda Sue	
73		Bauer, Madeline Eleanor	- Bauss, Rudolph William	
74		Bausser, Dailey Eugene	- Bayshore, Donald Forney	
75		Baysinger, Amy	- Beam, Louis William	
76		Beam, Lucille Emma	- Beary, Alexander David	
77		Beary, Allen Raymond	- Beaulieu, Bruce Joseph	
78		Beaulieu, Carl Aime	- Beck, Joheph Duke	
79		Beck, Joseph Fredrick	- Beckett, Kevin Elisabeth	
80		Beckham, Mabel R.	- Beechaver, John	

STANDARD FORM 135-A JULY 1967 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PAC ONLY	AGENCY			
	81.	Beechay, John James	- Beebe, John Richard	
	82.	Beebe, Kathryn Elisabeth	- Belden, Dorman Archie	
	83.	Belden, Dorothy Dean	- Bell, Gloria	
	84.	Bell, Gloria	- Bell, Melba	
	85.	Bell, Melvin	- Beller, Roy	
	86.	Beller Rudolf	- Belt, Klemett	
	87.	Belt, Lacy Porter	- Benedict, Ruth Fulton	
	88.	Bendig, Carol Ann	- Benner, Susan Jane	
	89.	Benner, Susie Fay	- Bennett, Lyvonne	
	90.	Bennett, M. Ruth	- Benson, Edwena	
	91.	Benson, Edwin	- Bentz, Ellen Mae	
	92.	Bentz, Aimee Jeanette	- Bergener, Donald King	
	93.	Bergener, Gordon Lyman	- Berke, Evelyn Frieda	
	94.	Berke, Fred Herman	- Bernazzoli, Jeffrey John	
	95.	Bernbach, Edythe Lillian	- Berry, Edward William	
	96.	Berry, Edwin Clark	- Bertini, Marguerite Eberhard	
	97.	Bertino, Albert Raymond	- Bethay, Willie Earl	
	98.	Bethe, Daniel Robert	- Bevill, Howard	
	99.	Bevill, J. C.	- Bickford, Ruth Sutherland	
	100.	Bickford, Samuel Morrill	- Biggerman, James John	
	101.	Biggers, Alberta	- Billison, Patsy Mae	
	102.	Bills, William Francis	- Birch, Mable Virginia	
	103.	Birch, Madie Odell	- Bishell, William Grayson	
	104.	Bisher, Darcus Jane	- Bitritto, Annette Rose	
	105.	Bitsacos, Gus	- Black Holston Eugene	
	106.	Black, Homer Bischoff	- Blackler, Warren Hanson	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES			DISPOSAL AUTHORITY
PRC ONLY	AGENCY				
	107.	Blackley, Carolyn Faye	-	Blair, Barbara Shiras	
	108.	Blair, Barry Joseph	-	Blakely, Quinence Lee	
	109.	Blakely, Ralph Clay	-	Blank, Kenneth William	
	110.	Blank, Lee Roy	-	Blasenyak, Joseph J.	
	111.	Blazer, Blair Clark	-	Bliznakoff, Violet	
	112.	Block, Rachel	-	Blosser, Susan Jane	
	113.	Blosser, Theron Vernon	-	Blutinger, Jeanne Elizabeth	
	114.	Blutman, Eli	-	Bocklund, Duane Roy	
	115.	Bockman, Betty Ann	-	Boetcher, Woodrow	
	116.	Boette, Louis Henry	-	Bohannon, Grady Maloy	
	117.	Bohannon, Harold Houston	-	Boldt, Gunter Eugene	
	118.	Boldt, Harold Oscar	-	Bolton, Ivy Esther-Meleod	
	119.	Bolton, J. C. (10)	-	Bonds, Ricker Johnny	
	120.	Bonds, Robert Carr	-	Bonsant, Roselle Cecelia	
	121.	Bonsante, Victor	-	Boss, Yvonne Jeanine	
	122.	Boosa, Russell Lee	-	Bordnick, Judith Ruth	
	123.	Bordo, Monica Frances	-	Borsotti, Catherine Mary	
	124.	Borst, Altie Louis	-	Bostuba, Felix Veginas	
	125.	Bostwick, Albert Lee	-	Boudreauf, Dorothy Ann	
	126.	Boudreaux, Edmond Anthony	-	Bouyer, Walter	
	127.	Bouyoucos, John Vinton	-	Bower, Frederick Woodrow	
	128.	Bower, Carnet Virginia	-	Bowline, William Ralph	
	129.	Bowling, Abraham	-	Box, Evelyn L.	
	130.	Box, Fay Troy	-	Boyd, Maureen Henrietta	
	131.	Boyd, Maurice	-	Boylan, Roy William	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FBC ONLY	AGENCY			
		132.	Boylan, Sara Agnes - Bracken, Guy Gilbert	
		133.	Bracken, Harris Russell - Bradley, Claire Reese	
		134.	Bradley, Clara Belle - Bradshaw, Ruth Williams	
		135.	Bradshaw, Sally Ann - Braisted, William Ernest	
		136.	Brait, Johann - Brandmayr, Ronald Joseph	
		137.	Branimeier, Frank Lourence - Branson, Thomas Walter	
		138.	Branson, Uzzell Singleton - Braun, Henry Phillip	
		139.	Braun, Herbert Anthony, - Breauf, Maria Charlene	
		140.	Breauf, Maric - Bremner, Karl Kenneth	
		141.	Bremner, Lucilb Jane - Breson, Susan Lee	
		142.	Bresowsku, Frances Angeline- Brewster, Dwight Lamar	
		143.	Brewster, Earl Cecil - Bridges, Zeph Jefferson	
		144.	Bridget, Albert C. - Briley, Eunice Margie	
		145.	Briley, F. Elaine - Briones, Gary Ray	
		146.	Briones, Hector A. - Britton, Vista Suzette	
		147.	Britton, Walker - Brockman, William John	
		148.	Brockmeier, Arthur Laurice - Bronowski, Carl Ann	
		149.	Brons, Herbert - Brooks, Nyland Otto	
		150.	Brooks, I. D. - Broomas, Philip	
		151.	Broome, Ralph Cornelius - Brown, Adocia	
		152.	Brown, Adolph - Brown, Carol Joyce	
		153.	Brown, Carol Katonka - Brown, David Rollo	
		154.	Brown, Donald Paschall - Brown, Frances Kay	
		155.	Brown, Frances L. - Brown, Herman	
		156.	Brown, Herman A. - Brown, John Byron	
		157.	Brown, John C. - Brown, Lloyd Frank	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PFC ONLY	AGENCY			
	158.	Brown, Lloyd G.	- Brown, Mehemiah Maceo	
	159.	Brown, Neil Ansel	- Brown, Robert Michael	
	160.	Brown, Robert Milburn	- Brown, Vernis	
	161.	Brown, Vernon	- Browne, Ronald William	
	162.	Browne, Rosalynd Valjean	- Bruce, Laurence Veimont	
	163.	Bruce, Leander L.	- Bruner, Ina Myrle	
	164.	Bruner, Jack	- Bryan, Bessie Fern	
	165.	Bryan, Beth Marie	- Bryant, Kenneth Simms	
	166.	Bryant, Kennis	- Buchalter, Zachary	
	167.	Buchan, Anita Delores	- Buck, Sylvia Catherine	
	168.	Buck, Teresa Lynn	- Budd, Preston Edmond	
	169.	Budd, Ralph Anthony	- Buhtz, Alice	
	170.	Bui, Adeline Rose	- Bulmahn, Regina Cecilia	
	171.	Bulman, Arthur	- Buonanno, Christine Marie	
	172.	Buonanno, Daniel Joseph	- Burdeno, Jolene Nina	
	173.	Burdick, Shirley Jane	- Burgin, Kathryn Virginia	
	174.	Burgin, LaMar	- Burke, Jordan David	
	175.	Burke, Joseph	- Burkins, R. Lee	
	176.	Burks, Dorothy J.	- Burnette, John Joseph	
	177.	Burnette, John Joseph	- Burnsm Newell James	
	178.	Burns, Nicholas John	- Burriss, Willie E.	
	179.	Burritt, Alice Marianne	- Burton, Gwendolyn Veleria	
	180.	Burton, Hallie Mae	- Bush, Charles P.	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FORM 41 (29) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
BOX ONLY	AGENCY			
181	Bush, Charles Ray	- Bustamante, Rosemary Phelps		
182	Bustamante, Ruben	- Butler, Hyrum Louis		
183	Butler, I. M.	- Butsch, Mary Louise		
184	Butsch, Matthew Gilbert	- Byerrum, Severen Everard		
185	Byers, A. J.	- Byrd, Terry Rodney		
186	Byrd, Thelma C.	- Caby, Dorothy Louise		
187	Cacabelos, Julian C.	- Cahoon, Ivan Wells		
188	Cahoon, Jack Elton	- Calderson, Rodriguez Pedro		
189	Calderwood, Alice M.	- Calhoun, Ruthie Mae		
190	Calhoun, Sally Jean	- Callen, Pamela		
191	Callen, Ralph Thomas	- Cameron, Alberta Jane		
192	Cameron, Alex Bernard	- Campbell, Beverly Mae		
193	Campbell, Bill Eliss	- Campbell, Jean Victoria		
194	Campbell, Jean Wendell	- Campbell, Syrone		
195	Campbell, Talmadge F.	- Candys, Allyne Leona		
196	Cane, Ann Lois	- Canose, Alice Marsh		
197	Canose, Russalice	- Caple, Kenneth Joe		
198	Caple, Larose Frances	- Carbone, Kay Frances		
199	Carbone, Lawrence A.	- Carey, Norval Emmett		
200	Carey, Olin Vernoy	- Carlson, Arnold Werner		
201	Carlson, Arthur	- Carmalt, Wilbur Brook		
202	Carman, Adele Barbara	- Caron, Virginia Mae		
203	Caron, Walter Clement	- Carpenter, Theresa Joan		
204	Carpenter, Thomas	- Carrano, Vincent Nunzio		
205	Carranza, Adelberto	- Carroll, Fritz Owen		
206	Carroll, Gabriel Alex	- Carson, Guy Edwards		

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PRC ONLY	AGENCY			
207	Carson, Halbert Carlos	-	Carter, Edvance	
208	Carter, Edward	-	Carter, Margy Lee	
209	Carter, Maria	-	Cartwright, Dorothy L.	
210	Cartwright, Eakle W.	-	Casaleggio, Stephen R.	
211	Casciani, Dorothy F.	-	Cashell, Jack	
212	Cashell, Lois Duane	-	Cassidy, William Henry	
213	Cassidy, William J.	-	Castle, William	
214	Castro, Abel Trevino	-	Cato, Wilma Thelma	
215	Catob, Erik David	-	Cayazos, Julian Gonzalez	
216	Cavazos, Karen Donneta	-	Cellary, John Joseph	
217	Celie, Gary Louis	-	Chadwell, Woodrow	
218	Chadwick, Adele Marie	-	Chamberlin, Wadell	
219	Chambers, Clauddean	-	Chance, Quentlin Delores	
220	Chance, R. J.	-	Chanson, Frank	
221	Chant, Alfred Edward	-	Chapman, William Cecil	
222	Chapman, William Charles	-	Charvat, Ernest J.	
223	Charvat, Frank John	-	Chavez, Antonia	
224	Chavez, Antonio	-	Chelvi, Richard Rudolph	
225	Chema, Frank	-	Chessen, Rose	
226	Chesser, Christina P.	-	Childers, Raymond Weir	
227	Childers, Reece	-	Chirart, Wayne Paul	
228	Chiri, Albert John	-	Chowlis, Sylvia Marie	
229	Chown, Fred Lewis	-	Christian, Joe Woodrow	
230	Christian, John	-	Christy, June Elizabeth	
231	Christy, Kathleen Ann	-	Cianciaruli, Marguerite R.	
232	Cianciarulo, Anne	-	Ciovacco, Mary Jean	

STANDARD FORM 135-A JULY 1962 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY Civil Service Commission	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES			DISPOSAL AUTHORITY
PREC ONLY	AGENCY				
	233	Cipa, Claudette Yolanda	- Clardy, Mary Leona		
	234	Clardy, Mildred Annette	- Clark, Elsie Katherine		
	235	Clark, Ernest S.	- Clark, Jose		
	236	Clark, Joseph	- Clark, Robert Eugene		
	237	Clark, Robert F.	- Clarke, Jon Ellis		
	238	Clarke, Joseph	- Clay, Isola Verne		
	239	Clay, J. C.	- Cleghon, Dorothy Gardner		
	240	Clemens, Abram Paul	- Clenin, Herbert Edward		

STANDARD FORM 135 JULY 1963 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 146-76-1		RECORD GROUP NO.	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		SIGNATURE		DATE RECORDS RECEIVED	
		TITLE			
FROM: (Name and address of Agency transferring records) Civil Service Commission 1717 H Street, N.W. Washington, D.C. 20415		TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 20409			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY CSC Only					
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE	B. STORAGE	A. FILE CABINETS (No.)	B. TRUNKS FILED (No.)	C. SHELVING (Lvs. Pk.)	
5. NAME OF AGENCY CUSTODIAN OF RECORDS CSC - Mr. Arthur J. Willis		6. BUILDING AND ROOM NO. CSC Room 814H		7. TELEPHONE NO. 202-632-6171	
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☐ NO					
9. AGENCY OFFICIAL (Signature)		10. TITLE		11. DATE	
12. BOX NUMBERS FRC ONLY		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
		United States Civil Service Commission Bureau of Personnel Investigation Security Investigative Index Cards			
241	Cleann, Lillian Alegra	-	Cline, Guy Wilson		
242	Cline, H. Roberta	-	Cloutier, Evelyn Grace		
243	Cloutier, Ferdinand Joseph N.	-	Cobb, Donna Ruth		
244	Cobb, Dora Orr	-	Cochran, Otto William		
245	Cochran, Pamela Diane	-	Coffey, Charles		
246	Coffey, Charles Clarence	-	Cohen, Bessie		
247	Cohen, Bessie W.	-	Coimenero, Daniel		
248	Coin, Brenda Joyce	-	Coldwell, William Lothrop		
249	Cole, Daily	-	Coleates, Linda Jo.		
250	Colebank, Billie Darlene	-	Coleman, Mathies John		
251	Coleman, Matthew	-	Collestio, Joseph Isadore		
252	Collet, Arthur M.	-	Collins, Cyrus E.		
253	Collins, Daisy Estelle	-	Collins, Mazata Etta		
254	Collins, McKinley	-	Colman, Yvonne Marie		
255	Colona, Carolyn E.	-	Combs, Robert James		
256	Combs, Robert Keith	-	Conaway, Richard Wayne		
257	Conaway, Robert F.	-	Conley, Clyde Wesley		
258	Conley, Coleman Lawrence	-	Conner, Charles Alan		
259	Conner, Charles Albert	-	Connors, Gretchen Aurelia		
260	Connors, Harlen Jay	-	Conti, Kenneth Anthony		
261	Conti, Laura Margaret	-	Conwell, William Franklin		
262	Conwill, Arthur Lewis	-	Cook, John Wilson		
263	Cook, John Wren	-	Cooke, Mabel Virginia		
264	Cooke, Mable Dianne	-	Cooney, Susan Therese		
265	Cooney, Terence James	-	Cooper, Jimmy Edward		
266	Cooper, Jo Ann	-	Cope, Brian Thornton		
267	Cope, Carl	-	Corbitt, Lydia Dail		
268	Corbly, Patricia Jane	-	Cordova, Manuel L.		

STANDARD FORM 135-A JULY 1963 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	PAGE _____ DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
	269	Cordova, Marcelino	- Cornell, Phyllis Louise	
	270	Cornell, Rachael	- Corsnitz, William Henry	
	271	Corso, Alexander	- Costa, Robert John	
	272	Costa, Robert Joseph	- Gotthoff, Kathryn C.	
	273	Cotti, Alfonso	- Coulter, Kingsley Richard	
	274	Coulter, Larson Leonard	- Couvlier, Mary Carolyn	
	275	Couyancy, Charles	- Cower, Junious	
	276	Cowern, Donald Harvey	- Cox, James Luther	
	277	Cox, James M.	- Coyier, Rita Marie	
	278	Coykendall, Arthur Clyde	- Cragun, Zella	
	279	Cragwall, Bedford	- Cramer, Robert Mathew	
	280	Cramer, Robert Oliver	- Cravey, Isaac Julian	
	281	Cravery, Jack Morris	- Crawford, Uriel	
	282	Crawford, Valeria Almarie	- Cremin, Patricia Ann	
	283	Cremins, Anna	- Cripple, Frank Edward	
	284	Cripps, Adrienne Gail	- Crockett, Sherman Nathaniel	
	285	Crockett, Shirley Etta	- Groom, Shelly Florine	
	286	Groom, Theodore	- Crossley, Melvin Lothrop	
	287	Crossley, Nancy Claire	- Crowe, Merle	
	288	Crowe, Michael	- Crumity, Willis Carl	
	289	Crumley, A. T.	- Cseri, Geza	
	290	Csernak, Carol Margaret	- Cullen, Orville Eugene	
	291	Cullen, Pamela A.	- Cummings, Ivan	
	292	Cummings, J.	- Cunningham, Mattie	
	293	Cunningham, Hazel Adele	- Curley, Everette Anthony	
	294	Curley, Flora Ann	- Curry, Mary Virginia	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
295	Curry, Matilda Anita	-	Curto, Pietro Guglieme	
296	Curto, Rene Catherine	-	Cypress, Billy L.	
297	Cypress, Carrie Felton	-	D'Agnostino, Luella Mae	
298	Dagrosa, Anthony James	-	Dalby Glen Allan	
299	Dalby, Harry Wallace	-	Dalton, Lyle Herbert	
300	Dalton, M. C. Jr.	-	Damuth, Gertrude	
301	Damuth, Leslie Earl	-	Daniele, Francis Xavier	
302	Daniele, Jack James	-	Danko, Alfred	
303	Danko, Andrew	-	Dark, Victor Irvin	
304	Dark, Warren Webster	-	Daugherty, Byrd	
305	Daugherty, C. W.	-	David, Dwight Edgar	
306	David, Earl Clinton	-	Davies, Evelyn Mae	
307	Davies, Fama Loren	-	Davis, Byron Scott	
308	Davis, C. A.	-	Davis, E. J.	
309	Davis, Earl	-	Davis, Grady Wade	
310	Davis, Graeme Atherton	-	Davis, Jimmie Douglas	
311	Davis, Jimmie Edwena	-	Davis, Louisa	
312	Davis, Louise	-	Davis, Paul Elijah	
313	Davis, Paul Elmer	-	Davis, Steave	
314	Davis, Stell	-	Davison, Ivan Ross	
315	Davison, J. R.	-	Day, Alvin T.	
316	Day, Amanda Marguerite	-	DeAguilera, Delfin Jose	
317	DeAguirre, Augusto Alejandro	-	Deane, Oscar Brigham	
318	Deane, Patricia Mary	-	DeBorba, Milton Joagum	
319	DeBouis, Daniel A.	-	Decker, Rey Melvin	
320	Decker, Richard Alan	-	Defonce, Richard Paul	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
321	Defond, Baptiste	-	Deittrick, Willie Mae	
322	Deitz, Allan Lester	-	Delay, Stanley	
323	Delay, Teresa	-	Delmistro, Raffaele	
324	Delmoe, Vincent	-	DeMarco, Theresa Mary	
325	DeMarco, Thomas	-	Dempsey, Joanne Marie	
326	Dempsey, John	-	Dennis, Cawlie	
327	Dennis, Cecil	-	Denton, Norwood	
328	Denton, Oleta F.	-	DeRoches, Cecille	
329	DeRochi, Brune	-	Desilet, Ronald	
330	Desilets, Albert Thomas	-	Deuel, Hollis Clayton	
331	Deuel, James B.	-	Devlin, Dwight Hugh	
332	Devlin, E. Barrett	-	Dexter, Irene Estelle	
333	Dexter, Jack Faulkner	-	DiBartolo, Winona Virginia	
334	DiBartolomeo, Anthony Salvatore	-	Dickerson, Queen Ester	
335	Dickerson, Ralph	-	Dideon, Charles Galen	
336	Diderich, Judith Ann	-	Diezyc, Barbara Linda Marion	
337	DiFabbio, Guide	-	Dillard, James Dupree	
338	Dillard, James Earl	-	DiMauro, Joseph P.	
339	DiMauro, Josephine	-	DiPaolantonio, Maria Elena	Rita
340	DiPaolo, Albert Daniel	-	DiTullio, Dolores	
341	DiTullio, Eileen Marquite	-	Dixon, Peter Christian	
342	Dixon, Phil	-	Dobson, Curtis S.	
343	Dobson, Daisy Lee	-	Dodson, Gwendalen Jean	
344	Dodson, Hardin Fran.	-	Dolan, Joe E.	
345	Dolan, John	-	Dominguez, Jose Parra	
346	Dominguez, Jose Rodriquez	-	Donat, William	

STANDARD FORM 135-A
JULY 1961 EDITION

GSA-15-10829-1

GPO 1967 O-361-007

175-262

STANDARD FORM 135-A JULY 1967 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BO - NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
347	Donate, Domingo,	-	Donnelly, Marguerite Arlene	
348	Donnelly, Marian Ruth	-	Donovan, John Joseph	
349	Donovan, Joseph Kevin	-	Dorhower, Kenneth Wilson	
350	Dori, Angelo Philip	-	Dorsey, Willour Mae	
351	Dorsey, Wilma Jean	-	Dougherty, Edward Francis	
352	Dougherty, Edward Gargiel	-	Douglas, Willard Orvis	
353	Douka, Basil Michael	-	Dowell, Donald Raymond	
354	Dowell, Earl Boyd	-	Downs, Myrtle Elizabeth	
355	Dows, Anne Trimble	-	Drabinsky, Suzanne Emma	
356	Drabish, Barbara Diane	-	Draughn, John William	
357	Draughn, Lee Charles	-	Drha, Stefanie Dorothy	
358	Drialo, Eugenia Helen	-	Drucker, Roseabell	
359	Drucker, Sadie Blanche	-	Dubois, Joline Jeanne	
360	Dubois, Joseph	-	Dudley, Hazel Elizabeth	
361	Dudley, Helen	-	Duffy, Norman Vincent	
362	Duffy, Ocie M.	-	Duke, Vivian M.	
363	Duke, Jr. Wade James	-	Dunbar, Ruth Rebecca	
364	Dunbar, Sally Elaine	-	Duncum, Roy E.	
365	Dunda, Catherine Rose	-	Dunn, Beecher Emory	
366	Dunn, Belinda Joyce	-	Dunn, William Oscar	
367	Dunn, William Patrick	-	Duran, Dorothy Ann	
368	Duran, Earle Edward	-	Durkin, Thomas William	
369	Durkin, Vincent James	-	Duvall, Ivan Delwin	
370	Duvall, Jack Warner	-	Dyer, Duane Allen	
371	Dyer, Earl P.	-	Eadar, Woodron Russell	
372	Eads, Alan Ray	-	Earman, Millicent Anne	

STANDARD FORM 135-A JULY 1967 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE	PAGE
BOA NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES			DISPOSAL AUTHORITY	
PRC ONLY	AGENCY					
373	Earman, Ralph Franklin	-	Eastridge, Lorene Ola			
374	Eato, Helen Rebecca	-	Ebmeyer, Sally Jayne			
375	Ebner, Albert Benedict	-	Edde, William Albert			
376	Eddelman, Crystle Delyte	-	Edington, Carrick Thomas			
377	Edington, Clack Edward	-	Edstrand, Sandra Lou			
378	Edstrohm, Leonard Alfred	-	Edwards, Gilbert			
379	Edwards, James Donald	-	Edwards, Usell Everett			
380	Edwards, Vada Irene	-	Egnew, Myrla Ann			
381	Egnew, Rebecca	-	Eilersen, Ruth Jane			
382	Eilert, Andree Lawrence	-	Eilcrat, Marion Gesina			
383	Eld, Alice Rose	-	Elkington, William Brice			
384	Elkins, Barry Lindsey	-	Elliott, Dwight Troy			
385	Elliott, Earl Jeffery	-	Ellis, Donald John			
386	Ellis, Donald Laverne	-	Ellis, William Douglas			
387	Ellis, William E.	-	Elsemore, Stanley P.			
388	Elsen, Albert Edward	-	Emerson, Rollie			
389	Emerson, Ronald Dean	-	Endriz, John Guiry			
390	Endrizzi, Al	-	Englert, Elizabeth Genevive			
391	Englert, Eugene Aaron	-	Ensley, Charles Homer			
392	Ensley, Charles Stephen	-	Erbstoeszer, Walter Emil			
393	Erby, Alex Darnell	-	Erkine, Charles Louis			
394	Erling, Carolyn Barbara	-	Escobar-Rosario, Lino			
395	Escobedo, Albert	-	Esshom, Edmund Ralph			
396	Essic, Elane Marjorie	-	Etherington, Thomas Paul			
397	Etherington, Wayne Parsons	-	Evans, Bezaleel			
398	Evans, Bill Keith	-	Evans, Jess David			

STANDARD FORM 135-A JULY 1963 EDITION GENERAL SERVICES ADMINISTRATION FORM (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PRC ONLY	AGENCY			
399	Evans, Jesse	-	Evans, Thelphs Alexandria	
400	Evans, Theodaus Francella-	-	Evers, Vivian Pauline	
401	Evers, Walter Frederick	-	Ezell, Imogene Catherine	
402	Ezell, J. Blondell	-	Fahir, Vivian Florence	
403	Fahl, Agnes Catherine	-	Falb, Robert	
404	Falba, Edward	-	Fanelli, Maurice	
405	Fanelli, Michael Allen	-	Farley, Fredric Lyle	
406	Farley, John	-	Farnsworth, Norman Curtis	
407	Farnsworth, Olvin Benjamin-	-	Farrington, Luida Elizabeth	
408	Farrington, Madeline M.	-	Faulkner, Diane Marie	
409	Faulkner, Donald	-	Fdiekenga, Imho	
410	Fea, Geraldine Hollie	-	Fegely, Warren Jacob	
411	Fegen, Joseph Peter	-	Feldman, Sheldon Alexander	
412	Feldman, Shirley	-	Fender, Doyle C.	
413	Fender, Edna Barbara	-	Ferguson, Azile Atle	
414	Ferguson, Barbara Ann	-	Ferguson, William Turner	
415	Ferguson, William V.	-	Ferrell, Clifton Gene	
416	Ferrell, Clyde Almore	-	Fetter, Joseph L.	
417	Fetter, Judith Rae	-	Field, Roland Lee	
418	Field, Rosalind Patricia	-	Fifelski, William David	
419	Fifer, Alfred Enos	-	Finch, Lolette	
420	Finch, Loran Wendall	-	Finkelstein, Louis	
421	Finkelstein, Manuel	-	Finrow, Marianne Catherine	
422	Fins, Elvira	-	Fiscus, Harry Earl	
423	Fiscus, Henry James	-	Fisher, James Douglas	
424	Fisher, James E.	-	Fisk, Gregory Gerard	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FBC ONLY	AGENCY			
	425	Fisk, Harley Robert	- Fitzgerald, Patsy Jane	
	426	Fitzgerald, Paul	- Flading, William Albert	
	427	Fladland, Donald James	- Flather, Mary P.	
	428	Flather, Oscar Mark	- Fleming, Marvin Stone	
	429	Fleming, Mary	- Fletcher, Willie Edd	
	430	Fletcher, Willie Floyd	- Flores, Fernando Rodriguez	
	431	Flores, Fidel	- Floyd, Gordon S.	
	432	Floyd, Gosnold Norwood	- Flynn, William Francis	
	433	Flynn, William P.	- Foley, Malcolm Edward	
	434	Foley, Mary	- Fontanez-Soto, Rafael	
	435	Fontanilla, Adelaida	- Ford, Alvin Walker	
	436	Ford, Andrew Jr.	- Ford, Perkins	
	437	Ford, Perry H.	- Forman, Everett Roy	
	438	Forman, Fayette June	- Fort Burt.	
	439	Fort, Carlos	- Foster, Arthur Lloyd	
	440	Foster, Bobby Gene	- Foster, Mary Louise	
	441	Foster, Mary Lynn	- Fousel, Walter Lew	
	442	Fouser, David	- Fox, Alexander Jr.	
	443	Fox, Alexander	- Fox, Walter Randolph	
	444	Fox, Walter Sammons	- Francis, Dewitt Talmage Jr.	
	445	Francis, Diane Marie	- Frank, Martha Topping	
	446	Frank, Martin Mr.	- Franklin, Prince Lee	
	447	Franklin, Q. V.	- Frasier, Violet Leale	
	448	Frasier, Wardell Franklin	- Frassetella, Robert Anthony	
	449	Freas, Alan D'yarmont	- Freedman, Ralph Michael	
	450	Freeman, Ray	- Freeman, IV Newton William	

STANDARD FORM 135-A JULY 1963 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE	PAGE
BO NUMBER		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES			DISPOSAL AUTHORITY
FRC ONLY	AGENCY				
451	Freeman, Nima Jean	-	French, Harry Walter		
452	French, Hartley George	-	Friberg, Walter Linus		
453	Fribley, Carolyn Jean	-	Friedrich, Stuart Lawrence		
454	Friedrich, Teresa Ann	-	Fritz, Joan Regina		
455	Fritz, John	-	Frullo, Raymond Lawton		
456	Frum, Austin Pendleton	-	Fuentes, Manuel Tadeo		
457	Fuentes, Marcial	-	Fuller, Doris E.		
458	Fuller, Doris Lee	-	Fulton, Joseph Murry		
459	Fulton, Joseph Nathaniel	-	Furminsky, Tobias		
460	Furnace, Brenda Jean	-	Gabbert, Ronald Delmont Jr.		
461	Gabourel Jr., Melvin Hurlbert	-	Gagne, Arthur Wilfred		
462	Gagne, Barbara E.	-	Galatis, George John		
463	Galanis, James	-	Gallagher, James Jude		
464	Gallagher, James Lawrence	-	Gallegos, Polo Padilla		
465	Gallegos, Rafael	-	Galvia, James William		
466	Galvin, Jane Anne	-	Gangle, Rudolph A.		
467	Gangler, Bette Louise	-	Garcia, Alcibiadis Leon		
468	Garcia, Alejandro	-	Garcia, Reynaldo Severiano		
469	Garcia, Ricarda	-	Gardner, Jimmis William		
470	Gardner, Maurice W.	-	Garifi, Andrew Joseph		
471	Garlanger, David Robert	-	Garrand, Irene Nellie		
472	Garrard, J. D.	-	Garrison, Douglas Frederick		
473	Garrison, Doyle Joylette	-	Garza, Andrew Talamontes		
474	Garza, Angel Macias	-	Gates, Byron Carter		
475	Gates, Caleb Frank	-	Gaunt, Wilma Nadene		
476	Gauntlett, Charles William	-	Gazaway, Julia Ann		

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION GSA GEN. REG. NO. 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBERS		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FPC ONLY	AGENCY			
	477	Gazaway, Leon Fred	- Geiduschek, E. Peter	
	478	Geier, Alexander	- Genick, Raymond Martin	
	479	Genie, Jeanne Mary	- George, Glenn Wilber	
	480	George, Gloria Ann	- Gerbig, Herbert Edward	
	481	Gerbig, Lee Charles	- Gerst, Walther	
	482	Gerstacker, Charles Edwards-Giacobazzi, Louis		
	483	Giacobbe, Andrew Michael - Gibbs, Liston Thomas		
	484	Gibbs, Lloyd Edward	- Gibson, Joseph Josiah	
	485	Gibson, Joseph Marion	- Gieser, Margaret Ann	
	486	Gieser, Robert James	- Gilbert, Sharon Lee	
	487	Gilbert, Sharon Louise	- Gill, Dennis Morton	
	488	Gill, Earl	- Gillespie, Robert Woodrow	
	489	Gillespie, Robin Marie	- Gillner, Sylvester Florence	
	490	Gillo, Anthony Joseph	- Gimpel Jr., Roy William	
	491	Gimpel, Sandra Fern	- Giris, William	
	492	Girismen, Mehmet Fahir	- Gladieux, Johanna Barbara	
	493	Gladieux, Kary Alan	- Glass, Lynn Ralph	
	494	Glass, Mabel Virginia	- Glenn, Gwendolyn Ruth	
	495	Glenn, Hal Jr.	- Glover, Ivan Edward	
	496	Glover, J. B.	- Godbey, Frank William	
	497	Godbey, George Lowry	- Goering, Ralph Raymond	
	498	Goering, Richard Bruce	- Golata, Theresa Jeane	
	499	Golata, Aladdin James	- Goldenberg, Augusta	
	500	Goldenberg, Barry David	- Goldstein, Joseph Arthur	
	501	Goldstein, Joseph E	- Gomez, Quintia	
	502	Gomez, R. Tomas	- Gonzalez-Williams, Pedro Juan	

STANDARD FORM 135-A JULY 1961 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BOX NUMBER		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
FRC ONLY	AGENCY			
503	Gonzalez. A. Margarita	-	Goode. Ivan	
504	Goode Jack Dwight	-	Goodman. Preston Oren	
505	Goodman Rachael Grace	-	Goodwin. Maryalice	
506	Goodwin Matthew	-	Gordon. Geraldine Laura	
507	Gordon Gerard Bernard	-	Gore. Vivian Ruth	
508	Gore Wallace Berry	-	Gosky. Henry John	
509	Gosla Calvin Bernard	-	Gouge. Conley	
510	Gouge David Lee	-	Gowie. Noel Henry	
511	Gowin Anna Shelma	-	Graf. Irving Lewis	
512	Graf Jack	-	Graham. Joyce Maxine	
513	Graham Juanita Cora	-	Granberry. Franklin Glenis	
514	Granberry Gale	-	Grant. Leroy Stephen	
515	Grant Leslie Benjamin	-	Graves. Carol Virginia	
516	Graves Carolyn	-	Gray. Donovan Oliver	
517	Gray Dora	-	Gray. Quinton Stallard	
518	Gray R. C.	-	Greco. Eugene Joseph	
519	Greco Felippo John	-	Green. Eugene Willard	
520	Green Eugenia Ann	-	Green. Laisel	
521	Green Lola Florence	-	Green. Willette	
522	Green William	-	Greene. Edward Eugene	
523	Greene Edward F.	-	Greenfield. Virginia Louise	
524	Greenfield. Wallace Ackerly-Greer, Marguerite Jordan			
525	Greer Marian Jane	-	Gregory. Rodger Kent	
526	Gregory Roger Alan	-	Gricunas. Frank	
527	Gricus. Anthony Francis	-	Griffin. Holsey	
528	Griffin Homer George	-	Griffith. Fuller Orville III	

STANDARD FORM 135-A 200-100 EDITION GENERAL SERVICES ADMINISTRATION FORM 141 (GSA) 101-12-2		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
REC'D - DELIVERED TO:		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PREC ONLY	AGENCY			
529	Griffith, Mary	-	Grim, Irene Myrtle	
530	Grim Jacquelyn Lee	-	Grisbaber, Robert Frank	
531	Grisham A. Floreine	-	Gronka, James Martin	
532	Gronke Bernard	-	Grossi, Olindo	
533	Grossi Peter Arnold	-	Grsich, Nick Joseph	
534	Grua Charles	-	Guaffi, Guido	
535	Guagenti Benedetta Elizabeth-	-	Guessow, Janice Madeline	
536	Guest A. B.	-	Guiseppe, Ralph Anthony	
537	Guiser Paul Lambert	-	Gunnarsson, Thor	
538	Gunne Thomas Michael	-	Gustafson, Melvin Harold	
539	Gustafson Michael	-	Guy, Bernice Ruth	
540	Guy Bessie Juanita	-	Haas, Everett Leo	

STANDARD FORM 135 JULY 1961 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 146-76-1		RECORD GROUP NO.	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		SIGNATURE		DATE RECORDS RECEIVED	
		TITLE			
FROM: (Name and address of Agency transferring records) CIVIL SERVICE COMMISSION 1717 H. Street N. W. Washington, D. C.		TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 20409			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY CSC ONLY					
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE	B. STORAGE	A. FILE CABINETS (No.)	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	
5. NAME OF AGENCY CUSTODIAN OF RECORDS CSC - Mr. Arthur J. Willis			6. BUILDING AND ROOM NO. CSC Room 814H		7. TELEPHONE NO. (202) 632-6171
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO			9. AGENCY OFFICIAL (Signature)		
			10. TITLE		11. DATE
12. BOX NUMBERS		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and form No.)	
PRC ONLY	AGENCY				
		UNITED STATES CIVIL SERVICE COMMISSION BUREAU OF PERSONNEL INVESTIGATIONS <u>SECURITY INVESTIGATIONS INDEX CARDS</u>			
	541	Haas, Florence Marie	-	Hackwood, Mary Jean	
	542	Hackworth, Adamae T.	-	Hagan, Virginia Catherine	
	543	Hagan, Walter A.	-	Hagy, Janice Lynn	
	544	Hagy, Jeralyn Marie	-	Hairston, Lynn Carlton	
	545	Hairston, Mable Garnetta	-	Hale, William Dudley	
	546	Hale, William E.	-	Hall, Connye Gail	
	547	Hall, Conrad Bertram	-	Hall, James Whitford	
	548	Hall, James Wilbur	-	Hall, Robbin Carol	
	549	Hall, Rodell Leroy	-	Halliburton, Hughen G.	
	550	Halliday, James Alvin	-	Ham, Byron Oliver	
	551	Ham, Calvin Lyle	-	Hamilton, Allen Wooster	
	552	Hamilton, Alma H.	-	Hamilton, Richard Streit	
	553	Hamilton, Richard T.	-	Hammerman, Florence Anne	
	554	Hammerman, Lawrence	-	Hampton, Charles Ann	

STANDARD FORM 135-A FEBRUARY 1959 EDITION GSA GEN. REG. NO. 27 5010-107-01 (REV. 1-57)		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
PREC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPOSAL AUTHORITY	
555	Hampton, Cheryl	- Hancock, Zan Osmer		
556	Hancovsky, Robert John	- Hamkin, Estella		
557	Hankin, Gerald Francis	- Hannan, Merlin F.		
558	Hannan, Michael Charles	- Hansen, Henrik William		
559	Hansen, Henry	- Hanson, John Richard		
560	Hanson, John Robert	- Harby, Samuel Farkas		
561	Harcar, Agnes	- Harding, Ewing Marshall		
562	Harding, Fannie Viola	- Hardy, Wan Edith		
563	Hardy, Ward Elored	- Harlan, Ralph Eugene		
564	Harland, Maggie Marie	- Harms, Rita Marie		
565	Harms, Robert Adolph	- Harper, Matilda Ione		
566	Harper, Mattie Bell	- Harrington, Aura		
567	Harrington, Barbara Ann	- Harris, Charles Kenneth		
568	Harris, Charles L.	- Harris, Gordon William		
569	Harris, Grace	- Harris, Leota Mae		
570	Harris, Leroy Sr.	- Harris, Roxie Lee		
571	Harris, Rny	- Harrison, Edward Louis		
572	Harrison, Edward Marcus	- Harrison, Willie Wayne		
573	Harrison, Willis	- Hart, Owen Donald		
574	Hart, Pamela Jane	- Hartman, James Russell		
575	Hartman, James Theodore	- Harvey, Charlene Gail		
576	Harvey, Charles	- Haseldon, Esther		
577	Haseley, Carl Lawrence	- Hastings, Myers Stelle		
578	Hastings, Nancy Lee	- Hatlewick, Joyce Ann		
579	Hatley, Aaron Calvin Jr.	- Hauser, Ruth Ellen		
580	Hauser, Sadie Mabel	- Hawkey, James Charles		

STANDARD FORM 135-A JAN 1962 EDITION GSA GEN. REG. NO. 27 FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FAC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPATCH AUTHORITY	
581	Hawkey, Joseph	- Hawkinson, Grace Alberta		
582	Hawkinson, Harlan Winslow	- Hayes, Armanette		
583	Hayes, Arnold Dwight	- Hayes, Rowena Ruth		
584	Hayes, Roy	- Haynie, Roy Woodrow		
585	Haynie, Ruth Lydia	- Head, Cyril P.		
586	Head, D. W.	- Hearn, Ross David		
587	Hearn, Roy Lee	- Hebron, Lulu Marion		
588	Hebron, Malinda Anna	- Heermance, Virgie Mae		
589	Heermann, Dale Frank	- Heiligenstein, Otto		
590	Heiliger, Augustus Alfred	- Heiszler, Mickeal Bernard		
591	Heit, Alan	- Helm, William B.		
592	Helm, William Donald	- Hemphill, Tyrone		
593	Hemphill, Vassar Dewey Jr.	- Henderson, Johnie Dillon		
594	Henderson, Johnnie	- Hendricks, Lewis Talbot		
595	Hendricks, Lillian Eleanore	- Henne, William Paul		
596	Hennebelle, Lyle Richard	- Henry, Israel Howard		
597	Henry, J. C.	- Henson, Buster Boyd		
598	Henson, C. L.	- Herdener, Russell Louis		
599	Herder, Anne Geraldine	- Hernandez, Jesse James		
600	Hernandez, Jesse Joe	- Herrera, Sylvia		
601	Herrera, Teodoro	- Hershkowitz, Victor		
602	Hershman, Alfred William	- Hesselius, Steve Anton		
603	Hessell, Robert	- Hewitt, Merule Ray		
604	Hewitt, Michael Dean	- Hickman, Cuthbert W.		
605	Hickman, Dale	- Hicks, Robert Russell		
606	Hicks, Robert Spencer	- Higgins, John Joseph		

STANDARD FORM 135-A MAY 1962 EDITION GENERAL SERVICES ADMINISTRATION GSA GEN. REG. NO. 27		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
RECEIVED BY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PREC ONLY	AGENCY			
	607	Higgins, John Kneeland	- Hildebrand, Everett Lee	
	608	Hildebrand, Fannie Roberta-	Hill, Edson George	
	609	Hill, Edward	- Hill John Owen	
	610	Hill, John P.	- Hill, Stanley Ward	
	611	Hill, Starrett Leroy	- Hillsgrove, Thomas Leigh	
	612	Hillsinger, Irene Mary	- Hines, Elijah	
	613	Hines, Elisabeth	- Hinton, Eddie Bryant	
	614	Hinton, Eddie Dee	- Hisky, John Robert	
	615	Hislair, Claude John	- Hobard, Donald Edward	
	616	Hobart, Aileen Patricia A.-	Hodam, William Fredrick	
	617	Hodan, Arlene Carol	- Hodnot, Pete C.	
	618	Hodo, Buster	- Hoffman, Duane Mathias	
	619	Hoffman, Earl	- Hofvendahl, Laurel Marie	
	620	Hoga, Donald Alexander	- Hoiman, Florence Clara	
	621	Hoin, Albert Thomas	- Holder, Marianne	
	622	Holder, Marie Louise	- Holland, Myrtle Olive	
	623	Holland, Nadine	- Hollingshad, William R.	
	624	Hollingshead, A. H.	- Hollstegge, Ronald C.	
	625	Hollstein, Catherine	- Holmes, Joe Nathan	
	626	Holmes, John	- Holt, Dwight John Sr.	
	627	Holt, Earl	- Holzworth, Shirline	
	628	Hom, Alice	- Hood, Rodger Raymond	
	629	Hood, Roger Alan	- Hoover, George Nollner	
	630	Hoover, George Otto	- Hopkins, Ura	
	631	Hopkins, Valeria Montes	- Horn, Gus	
	632	Horn, Hargis	- Horowitz, Isadore L.	

STANDARD FORM 135-A FEB 1962 EDITION GENERAL SUPPLY AGENT FORM (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE
100-101-101-101		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY	
FRC ONLY	AGENCY				
633	Horowitz, Isidore	-	Horwitz, Linda Kay		
634	Horwitz, Marc Jeffery	-	Hough, JDel Johnny		
635	Hough, John	-	Houston, Dwight O.		
636	Houston, Earl Byron	-	Howard, Ethan Victor		
637	Howard, Ethel	-	Howard, Stephen Lester		
638	Howard, Sterling	-	Howell, Everette Irl Jr.		
639	Howell, F. Albert	-	Hoxie, Michael Duane		
640	Hoxie, Phyllis Virginia	-	Hubbard, Norton Leroy		
641	Hubbard, Ocie	-	Hudgens, Ivah Louise		
642	Hudgens, J. C.	-	Hudson, Usie		
643	Hudson, Valarie	-	Huffman, Lynn Leigh		
644	Huffman, Mable	-	Hughes, Helene Patricia		
645	Hughes, Henry	-	Hughitt, Phyllis Jean		
646	Hughler, Willie	-	Humbird, Ruth LaVonne		
647	Humble, Ada Elsie	-	Hundt, Stephen Ablert		
648	Hundtolt, Alvin P.	-	Hunt, Oaro H.		
649	Hunt, Pamela Crystal	-	Hunter, Myrtle Jane		
650	Hunter, Nadine Alicia	-	Hurley, Esikel Lafeatte		
651	Hurley, Faye Joyce	-	Huskey, Julia		
652	Huskey, Kathleen Virginia	-	Hutchinson, Porter E.		
653	Hutchinson, Ralph Edward	-	Hyde, Dwight Ernest		
654	Hyde, Earl	-	Iannaotti, Stephen A.		
655	Iannucci, Alfred F.	-	Imhoff, Helen Marie		
656	Imhoff, James Robert Jr.	-	Ingram, Ivy Thomas		
657	Ingram, J. B.	-	Ireland, Evola		
658	Ireland, Fay Wilma	-	Isaacs, Cyril		

STANDARD FORM 135-A JULY 1963 EDITION GENERAL SERVICES ADMINISTRATION GSA GEN. REG. NO. 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FORM 135-A-1		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PRC ONLY	AGENCY			
	659	Isaacs, Daniel Boone	- Iturrino, Rinaldo	
	660	Itz, Agnes Olga	- Jackel, Leonard	
	661	Jackel, Marcus	- Jackson, David Crawford	
	662	Jackson, David Daniel	- Jackson, Herline Ordell	
	663	Jackson, Herman	- Jackson, Lucious Norman	
	664	Jackson, Lucius	- Jackson, Sallie Lee	
	665	Jackson, Sallie Mae	- Jacobs, Diane Elizabeth	
	666	Jacobs, Dolores Marie	- Jacobson, Margaret Leone	
	667	Jacobson, Margaret Mae	- Jaillet, Flavie J. F.	
	668	Jaillet, John Baptiste Jr.	- James, Katie Pricella	
	669	James, Kaye Ladene	- Jamvold, Mary Lou	
	670	Jan, Allen	- Jaramillo, Donicio	
	671	Jaramillo, Eddie Arthur	- Jasper, Kenneth Thomas	
	672	Jasper, Lawrence Grant	- Jefferson, Ruther Henry	
	673	Jefferson, Sadie	- Jenkins, Dwylia Doreen	
	674	Jenkins, M. C.	- Jenkins, Wayne Willard	
	675	Jenkins, Welson Eugene	- Jensen, David Verle	
	676	Jensen, Dean Gregory	- Jernigan, Virginia Lee	
	677	Jernigan, Walker Lewis	- Jilek, Thomas Edward	
	678	Jiles, Alonso Kenneth	- Johner, Mary Elizabeth	
	679	Johner, Peter J.	- Johnson, Arthur Lyle	
	680	Johnson, Arthur M.	- Johnson, Charles Merrill	
	681	Johnson, Charles Michael	- Johnson, Doris Karoline	
	682	Johnson, Doris L.	- Johnson, Evelyn Eugenia	
	683	Johnson, Evelyn Fae	- Johnson, Harold Leeroy	
	684	Johnson, Harold Leon	- Johnson, James Lenard	
	685	Johnson, James Leo	- Johnson, Julious Jr.	

STANDARD FORM 135-A FEBRUARY 1960 EDITION GENERAL SERVICES ADMINISTRATION GSA GEN. REG. NO. 27		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
RECORDS RECEIVED		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
PREC ONLY	AGENCY			
	686	Johnson, Julius	- Johnson, Mabel Luella M.	
	687	Johnson, Mabel Mary Brown	- Johnson, Nita Yolande	
	688	Johnson, Noah	- Johnson, Robert	
	689	Johnson, Robert A.	- Johnson, Stanky	
	690	Johnson, Stanley	- Johnson, William Axel	
	691	Johnson, William B.	- Johnston, John Arbuckle	
	692	Johnston, John B. II	- Jolstad, Raymon Clyde	
	693	Joly, Alice May	- Jones, Byron Wendell	
	694	Jones, Carl Douglass	- Jones, Donald Dupont	
	695	Jones, Donald E.	- Jones, Francine Elizabeth	
	696	Jones, Francis Alonzo	- Jones, Henrisena	
	697	Jones, Henry	- Jones, John Dudley	
	698	Jones, John E.	- Jones, Lorna Vern	
	699	Jones, Lorraine	- Jones, Ophus Jentry	
	700	Jones, Ora	- Jones, Ronay Lucinda	
	701	Jones, Ronda	- Jones, Wayland Reynard	
	702	Jones, Wayman Alexander	- Jordan, Elizabeth W.	
	703	Jordan, Ella Berg	- Jordshaugen, Gregg D.	
	704	Jordt, Dwain Oliver	- Joyce, Dulcie Ophelia	
	705	Joyce, Earline	- Juenker, Jean Margaret	
	706	Juergen, Rein Robert	- Justice, Dwight Jr.	
	707	Juctice, Earl	- Kahlert, Violet May	
	708	Kahley, Ammon Pete	- Kalish, Leonard Lewis J.	
	709	Kalish, Manny	- Kanapolis, Anthony Thomas	
	710	Kanar, Betty Florence	- Kapaona, Phillip Kaanaana	
	711	Kapar, Ann	- Karklys, Elvira	

STANDARD FORM 135-A POLY COPY SYSTEM GENERAL SECURITY ATTACH FORM (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
REC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES		DISPOSAL AUTHORITY
	712	Karkmeyer, William	- Kaso, George Edward	
	713	Kasofsky, Harry	- Katz, Samuel	
	714	Katz, Samuel E. Dr.	- Kawahakui, Rachel K.	
	715	Kawahara, Bert Hajime	- Kearney, Plummer Edwin	
	716	Kearney, Ralph George	- Keegstra, John Arthur	
	717	Keehan, Alice Rebecca	- Keesy, Judith Ann	
	718	Keet, Constance Young	- Keith, Ruth E.	
	719	Keith, Sally, Regina	- Keller, Ruth Urania	
	720	Keller, Sally Jane	- Kelley, Thomas I.	
	721	Kelley, Thomas J.	- Kelly, Harry Hill	
	722	Kelly, Harry Joseph	- Kelly, Shivers Jr.	
	723	Kelly, Sidney Daniel	- Kemper, Eulalia Irene	
	724	Kemper, Fern	- Kennedy, Bernadine Ann	
	725	Kennedy, Bernard	- Kennedy, Norval Clifton	
	726	Kennedy, O'Betra Faye	- Kent, Courtney	
	727	Kent, Dalam Evan	- Kern, Anthony William	
	728	Kern, April Dawn	- Kersten, Herman, Emil	
	729	Kersten, Janet Rose	- Kevilus, Anne Margaret	
	730	Kevin, Catharine Mary	- Kidd, Ruth Sharon	
	731	Kidd, Sally Ann	- Kilbury, Theodore J.	
	732	Kiley, Agnes Elizabeth	- Kilstrom, Ona Mary	
	733	Kiltau, Betty Theresa	- Kinard, Paul C.	
	734	Kinard, Quillie Emanuel, Jr.	- King, Dayton Jack	
	735	King, Dean Claire	- King, John Morgan Jr.	
	736	King, Joseph	- King, Ruth Vernelle	
	737	King, Saddle Lee	- Kinnevey, Cecilia	

STANDARD FORM 135-A REV. 7-1960 EDITION GSA GEN. REG. NO. 27 FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
PREC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	FISCAL AUTHORITY	
738	Kirney, Ada Dorothea	- Kirby, Jon Allan		
739	Kirby, Joseph	- Kirkland, Sylvia June		
740	Kirkland, Teresa	- Kisuk, Anna		
741	Kisner, A. Faye	- Klaburner, Eunice Janet		
742	Klagan, Cynthia Anne	- Klein, Morey		
743	Klein, Morris	- Kline, Ivan Carstater		
744	Kline, Jack Albin	- Kluge, Jean Ruth		
745	Kluge, Joann Kathryn	- Knickerbocker, Mildred E.		
746	Knickerbocker, Anne Carol	- Knighton, Willis Sackett		
747	Knights, Annie Inez	- Knox, Charlene		
748	Knox, Charles Bertson	- Koch, Lynnell Geraldine		
749	Koch, Magdalen Ann	- Koester, William Stanley		
750	Koesterer, Clara	- Kolek, Walter Stanley		
751	Kolenber, Judith Marie	- Koon, Iris Odell		
752	Koon, James Frank Jr.	- Kornaus, Alvin Paul		
753	Kornbacher, Carol Dawn	- Kostrzowski, Theodore J.		
754	Kostu, Joseph	- Kowalak, Wallace Joseph		
755	Kowalchek, Clara	- Kralic, Rita Martha		
756	Kralicek, Amel T.	- Krause, Douglas Carl		
757	Krause, Earl	- Krentzman, Sylvia		
758	Krenz, Adolph	- Kroells, Raymond Reinhold		
759	Kroemer, Esther Pearl	- Krugness, Mirne Lu H.		
760	Kruh, Robert Frank	- Kucinski, Shirley May		
761	Kuczka, Joseph Eugene	- Kulgren, Janice Arleen		
762	Kulha, Barbara Ann	- Kuritzky, Sayde		
763	Kuriyama, Akiyoshi	- Kuzmyak, John		
764	Kuznacic, Paul	- Labrecque, Virginia D.		

STANDARD FORM 135-A JULY 1963 EDITION GENERAL SERVICES ADMINISTRATION FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FAC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPATCH AUTHORITY	
765	LaBree, Albert Simone	- Lacy, Vivian LaRue		
766	Lacy, Wade Hampton Jr.	- Lager, Dorothy May		
767	Lager, Elmer Woodrow	- Lakes, David Michael		
768	Lakes, Eddie	- Lambert, Burton Alphonso		
769	Lambert, Cabe Monroe	- LaMorgia, Victor		
770	LaMori, Robert	- Landaw, Janet Marie		
771	Landay, Barbara Lynn	- Lane, Arnold Joseph		
772	Lane, Arthur	- Lang, Dewey		
773	Lang, Diana Jeanette	- Langley, Bruce Edford		
774	Langley, Deborah Lynn	- Lanou, Lynne Marie		
775	Lanoue, Barbara Marina	- Lara-Zarare, Francisco		
776	Larberg, Florence Sadie	- Larsen, Elma L.		
777	Larsen, Elmer	- Larson, Syneva		
778	Larson, Tage R.	- Latchum, James Levin		
789	Late, John Robert	- Laudy, Rosalie Maria		
780	Laue, Alyson	- Lavender, Ivy Marie		
781	Lavender, Jack Kenneth	- Lawrence, Benson		
782	Lawrence, Bernadine	- Lawson, David Keith		
783	Lawson, David Lee	- Lay, Sherman Columbus Jr.		
784	Lay, Sophie Esther	- Leach, Vivian Violet		
785	Leach, Waddell	- Leavitt, Bruce Arvin		
786	Leavitt, Carl Hart	- Ledbetter, Ruth Vasta		
787	Ledbetter, Sam Fletcher Jr.	- Lee, Earnestine		
788	Lee, Eddie	- Lee, Larry LaMont		
789	Lee, Larry Leroy	- Lee, Ursula Maude		
790	Lee, Valaska Lorraine	- LeFlore, Joe Bell		
791	LeFlore, John Douglas	- Lehsten, Robert Allen		

STANDARD FORM 135-A FEDERAL BUREAU OF INVESTIGATION U.S. DEPARTMENT OF JUSTICE FORM 101 (REV. 10-1-55)		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
REC ONLY	AGENCY	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPOSAL AUTHORITY	
792	Lehti, Allen Henry	- Lekniskas, Freida		
793	Leko, Konstantin A.	- Lencioni, Valentino		
794	Lenck, Eric Einar	- Leonard, Elise Lucette		
795	Leonard, Elizabeth	- Lequis, William John Jr.		
796	Lequier, George Andrew	- Lester, Hermyonne Louise		
797	Lester, Hertha Elizabeth	- Leverland, Marie Hanna		
798	Leverman, Bruce	- Levitt, Stephen Leonard		
799	Levitt, Thomas Augustus	- Lewis, Buddy Gene		
800	Lewis, Buelah Emma	- Lewis, Harry Raymond		
801	Lewis, Harry Roy	- Lewis, Mary Etta Young		
802	Lewis, Mary Evangeline	- Lewis, William		
803	Lewis, William Aaron	- Lickers, Ronald Norman		
804	Lickert, Albert Michael	- Lightfoot, Arthur Robert		
805	Lightfoot, Barbara Ann	- Limperos, Thomas Andrew		
806	Limpert, Charles Adolph	- Lindley, Robert Milton		
807	Lindley, Robert Owen	- Lineberry, Billie Jo		
808	Lineberry, Carolyn Sue	- Linville, Orrin Logan		
809	Linville, Patricia Ann	- Lisowe, Irene Marie		
810	Lisowski, Cecilia Louisa	- Little, Thomas Frank		
811	Little, Thomas G.	- Livingston, Muriel		
812	Livingston, Nadone Bernice	- Lobarbio, Milagros A.		
813	Lobas, Stephanie Veronica	- Lockwood, Arthur Dean		
814	Lockwood, Arthur Earl Sr.	- Logan, Charles Louis		
815	Logan, Charles Otis	- Lolya, Margaret Elizabeth		
816	Lom, Bella	- Long, Elizabeth Veronica		
817	Long, Ella Louise	- Long, Thomas Henry		
818	Long, Thomas J.	- Loontjens, Maurice J. Jr.		

STANDARD FORM 135-A FOR THE ENTIRE FEDERAL SERVICE ADMIN FORM (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FRC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPOSAL AUTHORITY	
819	Loop, Angus Leroy Jr.	- Lopez-Cruz, Victor		
820	Lopez-D, Rosa Elena	- Loszewski, Theresa D.		
821	Lota, Darlinda Arayan	- Love Arthur		
822	Love, Arthur Charles	- Lovermi, Paul P.		
823	Lovern, Arnold Scott	- Lowe, Walter Raymond Jr.		
824	Lowe, Walter Samuel	- Loyd, Murphy Douglas		
825	Loyd, Nancy Jane	- Lucas, Robert Irving		
826	Lucas, Robert James	- Ludlow, James Herbert		
827	Ludlow, James Patrick	- Lukenovich, Alex		
828	Lukens, Alan Lee	- Lundin, Erik Clifford		
829	Lundin, Faye Lorraine	- Lustig, Suzanne Gloria		
830	Lustumbo, Salvatore George	- Lyle, Ina Glynn		
831	Lyle, James Delbert	- Lynch, Retha Edna		
832	Lynch, Reva Carolyn	- Lyons, James Richard		
833	Lyons, James Spencer	- Macassaet, Albert P.		
834	Macatangay, Angelito S. J.	- MacGillivray, Lucy L.		
835	MacGillivray, Marilyn Jean	- MacKay, Qui Yon		
836	MacKay, Ralph Miller	- MacMoyle, Hugh Hayborn		
837	MacMullan, Charles Francis	- Maddox, Johanna		
838	Maddox, John	- Maesei, Ruth Margaret		
839	Maeser, Arthur Louis	- Magny, Charles		
840	Mago, Angelo S.	- Mahalick, Violet Maxine		
841	Mahon, Patricia Ann	- Main, Lyndell Ray		
842	Main, Mabel Violet	- Malakie, Jeanne		
843	Malakoff, Aaron Francis	- Mallett, Myra Jane		
844	Mallett, Nathalie Averil	- Malone, Vivian Eleanor		
245	Malone, Waldo Emerson	- Manczuk, Carl Alexander		

3/51,30-7-4 ¹³ PAGES

STANDARD FORM 135 JULY 1963 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.6	RECORDS TRANSMITTAL AND RECEIPT	TO BE COMPLETED AT FEDERAL RECORDS CENTER	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		ACCESSION NO. 146-76-1	RECORD GROUP NO.
		SIGNATURE _____	
		DATE RECORDS RECEIVED _____	
FROM: (Name and address of Agency transferring records) CIVIL SERVICE COMMISSION 1717 H. Street N. W. Washington, D. C.		TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 20409	
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY CSC ONLY			
2. SQUARE FEET OF SPACE CLEARED A. OFFICE _____ B. STORAGE _____		3. FILING EQUIPMENT EMPTIED A. FILE CABINETS (No.) _____ B. TRANS. FILES (No.) _____ C. SHELVING (Lbr. Ft.) _____	
5. NAME OF AGENCY CUSTODIAN OF RECORDS CSC - Mr. Arthur J. Willis		6. BUILDING AND ROOM NO. CSC Room 814H	
7. TELEPHONE NO. (202) 632-6171		8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO	
9. AGENCY OFFICIAL (Signature) _____		10. TITLE _____	
11. DATE _____		12. BOX NUMBERS FAC ONLY _____ AGENCY _____	
13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records) UNITED STATES CIVIL SERVICE COMMISSION BUREAU OF PERSONNEL INVESTIGATIONS <u>SECURITY INVESTIGATIONS INDEX CARDS</u>		14. DISPOSAL AUTHORITY (Schedule and Item No.)	

STANDARD FORM 135-A 2-7-60 EDITION GSA GEN. REG. NO. 27 FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
BULK TRANSMISSION		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DISPOSAL AUTHORITY	
FRC ONLY	AGENCY			
846	Mand, Charles Louis	- Manigglan, Martin		
847	Manighan, Alice Mae	- Mannchen, Karen Lynn		
848	Manne, Allen Edward	- Mansfield, Virginia Lee		
849	Mansfield, Walter Durant	- Maranoff, Harriet		
850	Maranon, James	- Marcus, Hyman Leon		
851	Marcus, Ida	- Marino, Frederick Michael		
852	Marino, Gabriel Frank	- Marks, Everett William		
853	Marks, Faunda Grey	- Marquette, William Morris		
854	Marquez, Aaron Cicero	- Marsh, Norman Torrence		
855	Marsh, Ocie Wilson	- Marshall, Mitchell		
856	Marshall, Mollie Ruth	- Martin, Arlyne Estelle		
857	Martin, Armand Joseph	- Martin, Evelyn Greene		
858	Martin, Evelyn Irene	- Martin, John Jay		
859	Martin, John Jerry	- Martin, Pauline Yvonne		
860	Martin, Pearl	- Martin, William Kenneth		
861	Martin, William L.	- Martinez, Jose Bonifacio		
862	Martinez, Jose C.	- Martowski, Stanley John		
863	Martrano, Arthur John	- Maskeny, George Edward		
864	Masker, Albert M.	- Mason, Rovert Isidore		
865	Mason, Robert J.	- Mast, William Wayne		
866	Masta, Daniel Thomas	- Mathesius, Walther F. L.		
867	Matheson, A. Leon	- Matievich, Mike		
868	Matig, Joseph Fred	- Mathews, Charles George		
869	Mathews, Charles H.	- Mattill, John Isham		
870	Mattimoe, James Patrick	- Maufroy, Leon Rene		
871	Mauga, Apuaura Fanaufouina-	Maxon, Kenneth Wayne		

STANDARD FORM 135-A 1962 EDITION GSA GEN. REG. NO. 27 FPMR (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE
TO: (FRC ONLY)		FROM: (FRC ONLY)			TO: (FRC ONLY)
FRC ONLY	AGENCY	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES			DEPT. OF AGRICULTURE
872	Maxon, Leo Jr.	-	May, Rita Yvonne		
873	May, Robert	-	Mayflower, Charles G.		
874	Mayford, Blair Christy	-	Mazalewski, Robert John		
875	Mazall, Frank John	-	McAllister, Powhatan		
876	McAllister, R. Wayne	-	McBride, Lenord Jr.		
877	McBride, Leo Clifton	-	McCall, Lyman Brady		
878	McCall, Mabel Anice	-	McCarter, Hal Sanford Jr.		
879	McCarthy, Ada E.	-	McCarty, Russell Gordon		
880	McCarty, Sally Ann	-	McClave, Thomas Patrick		
881	McClay, Adrian Lee	-	McClung, Dwyer Edmend		
882	McClung, Earl Arlo	-	McConnell, Burt Raphael		
883	McConnell, Calloe Lyn	-	McCormick, John Leroy		
884	McCormick, John Martin	-	McCoy, Vesta		
885	McCoy, Vicki Elaine	-	McCugh, Lonnie Eugene		
886	McCuen, Elmer Jr.	-	McDaniel, Amos Edwin		
887	McDaniel, Andrew	-	McDonal, William Paul		
888	McDonald, A. L.	-	McDonald, Robert Joseph		
889	McDonald, Robert Keith	-	McDowell, Pinkie Mae		
890	McDowell, R. C.	-	McEwen, Philip Joseph		
891	McEwen, Rachel Etta	-	McGarrh, Ollie Mae		
892	McGarrie, Carile Sue	-	McGill, Duff Wilson		
893	McGill, Earon Lewis	-	McGovern, Isabel Avice		
894	McGovern, James	-	McGrew, Dorothy Mae		
895	McGrew, Edward Laurene	-	McHenry, Wayne Wright		
896	McHenry, Wilbert Fred	-	McIntyre, Samuel Milton		
897	McIntyre, Sandra Jo	-	McKeever, Polly Darby		

STANDARD FORM 135-A OFFICE USE ONLY FOR RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE
PREC ONLY	AGENCY	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	INITIALS AND SIGNATURE
898	McKeever, Ralph L.	- McKerry, Rosita	
899	McKersie, Robert Bruce	- McKinney, Quincey	
900	McKinney, Ralph George	- McLargin, James Irvin	
901	McLarin, Clavin Wayne	- McLean, Vivian LaVan	
902	McLean, Walter Andrew	- McMahan, Sylvester Joseph	
903	McMahon, Talmadge Glenn	- McMillion, Wilma Louise	
904	McMillon, Adeline	- McNanara, Phyllis Virginia	
905	McNamara, Ralph Gerald	- McNichols, William Leo	
906	McNickle, Arthur John	- McQuerry, Pauline M.	
907	McQuerry, Ronald Frank	- McVea, Alvin Pamas	
908	McWhirter, Garland Dwight	- Meagher, Joseph Walter	
909	Meagher, Karen Louise	- Medina, Rosie Chavez	
910	Medina, Roy E.	- Mefferd, Wendell V.	
911	Meffert, Carl Henry	- Mejsak, Ronald Edward	
912	Meka, Alfreda C.	- Melsom, Geralyn Ann	
913	Melson, Annie Jane	- Mendez, Quida Cherie	
914	Mendez, Rafael	- Mercado, Zenaida	
915	Mercado, Acevedo Juan	- Merline, Lawrence John	
916	Merkling, Carole Ann	- Merritt, Ruth May	
917	Merritt, Sallie Mae	- Messina, Oscar Peter	
918	Messina, Pasquale,	- Metzler, Ivan Thompson	
919	Metzler, Jack Frank	- Meyer, Robert Durlin	
920	Meyer, Robert Edmind	- Michael, Mary June	
921	Michael, Mary Lee	- Mickiewicz, William	
922	Mickins, Charles Harvey	- Migneault, Viola Salange	
923	Migneco, Domenico	- Miles, Beverly Jennifer	
924	Miles, Bill Joe	- Millberry, Sara L.	

STANDARD FORM 135-A U. S. GOVERNMENT GENERAL SERVICES ADMINISTRATION WASHINGTON, D. C. 20540		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	RECEIVED	DATE
FRC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	DEPARTMENTAL AUTHORITY	
925	Millbourn, Albert H.	- Miller, Charles K. Jr.		
926	Miller, Charles L.	- Miller, Emery Monroe		
927	Miller, Emil	- Miller, Hermelinda		
928	Miller, Herman	- Miller, John Kilioi Jr.		
929	Miller, John L.	- Miller, Margery Ann		
930	Miller, Mark Halvor	- Miller, Richard Frederick		
931	Miller, Richard G.	- Miller, Veola Victoria		
932	Miller, Vera Aleta	- Milliman, William James		
933	Millimet, William	- Mills, E. Rhoda Renae		
934	Mills, Richard	- Minaert, Charles T.		
935	Minafo, Frank	- Minoglio, Anthony L.		
936	Minogue, Anthony	- Mirmow, Rita Belle		
937	Miro, Antonio	- Mitchell, Cyrus W.		
938	Mitchell, D. C.	- Mitchell, Jordan J.		
939	Mitchell, Joseph	- Mitchell, Thomas Lee		
940	Mitchell, Thomas M.	- Mizer, William Vincent		
941	Mizera, Cecilia T.	- Moe, Aida Irene		
942	Moeller, Marcellus A.	- Moland, Willie Chester		
943	Molander, Adrian	- Monaghan, Nicholas J.		
944	Monaghan, Patricia L.	- Monroe, Ann Elizabeth		
945	Monroe, Anna Louise	- Monteiro, Victor Grosjean		
946	Monteith, Ada Mae	- Montgomery, Theron E.		
947	Montgomery, Thomas	- Moody, Willard B.		
948	Moody, William	- Moore, Bigstaff		
949	Moore, Bill	- Moore, Ernest George Jr.		
950	Moore, Ernest H.	- Moore, James Willard		

STANDARD FORM 135-A A TWO PART FORM GSA GEN. REG. NO. 27 MAY 1962 EDITION GSA GEN. REG. NO. 27		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FRC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	RECEIVED AUTHORITY	
951	Moore, James William	- Moore, Marsha Odette		
952	Moore, Marshall	- Moore, Russelline Boone		
953	Moore, Ruth	- Moorman, Irene Kathryn		
954	Moorman, Jack Alvin	- Moran, Perrin Mark		
955	Moran, Peter Vernard	- Moreno, Proco Joseph		
956	Moreno, Rachel Alice	- Morgan, Houston		
957	Morgan, Howard	- Morgan, Robert Hugh		
958	Morgan, Robert James	- Mark, Lyle Gene		
959	Mork, Marilyn Phyllis	- Morris, Douglas Harold		
960	Morris, Douglas Harvey	- Morris, Marvin W.		
961	Morris, Mary Elizabeth	- Morrison, Elma Eunice		
962	Morrison, Elmer Charles	- Morrow, Kenton Edwin		
963	Morrow, L. C.	- Morton, Kolumun		
964	Morton, L. D.	- Moses, Joe		
965	Moses, John	- Moss, John		
966	Moss, John A.	- Moudy, Winifred Everette		
967	Mouer, Audrey May	- Moye, Kenneth Ray		
968	Moye, Lawrence Jerome	- Mueller, Donald Walter		
969	Mueller, Donald Wilburn	- Mulhair, Robert J.		
970	Mulhall, Bertha Jane	- Mullesch, Edward James		
971	Mullett, Angelina J.	- Mulzoff, Stephen-Stanley E.		
972	Mum, Mary E.	- Munroe, Kyra Leticia		
973	Munroe, Laura Lillian	- Murphit, John Brady		
974	Murphy, A. C.	- Murphy, James Louis		
975	Murphy, James M.	- Murphy, Richard Ira		
976	Murphy, Richard J.	- Murray, Frances T.		

FEDERAL FORM 135-A RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		ALIAS	DATE
RECORDS TRANSMITTAL		RECORDS RECEIVED	
REC ONLY	AGENCY	REMARKS	
977	Murray, Francis	- Murray, William Ezra	
978	Murray, William F.	- Mussyski, Antoinette D.	
979	Must, Arthur John	- Myers, Harriet J.	
980	Myers, Harry	- Myhan, William Howard	
981	Myhand, Charles Trayler	- Nagel, Evelyn Elizabeth	
982	Nagel, Farada Lee	- Nalls, Judy Lucille	
983	Nalls, Kathryn Ann	- Naruszewics, Peter Paul	
984	Naruto, Shoichi Soapy	- Natoli, Donald James Jr.	
985	Natoli, Edward George	- Neal, Francis Marion	
986	Neal, Frank Archibald	- Neby, Rick Lee	
987	Neca, Anthony Dominic	- Nehlig, Roseanna Fox	
988	Nehls, Albert	- Nelosn, Berry David	
989	Nelson, Bert C.	- Nelosn, Helen Ludwig	
990	Nelson, Mable	- Nelson, Nicholas Macy	
991	Nelson, Nick Dwight	- Nenning, John Peter	
992	Nemninger, Anne Wallace	- Neubaum, William Charles	
993	Newbeck, Alphons Oscar	- Newberry, Helena Kay	
994	Newberry, John Aaron	- Newlove, Gary Lynn	
995	Newlove, John Kandel	- Newsom, Norman Neal	
996	Newsom, Odis	- Nice, Julie Rae	
997	Nice, Karl George	- Nichols, Marvin W. Jr.	
998	Nichols, Mary	- Nickens, Irraina Joyce	
999	Nickens, Jack	- Nielsen, Linda Kay	
1000	Nielsen, Lloyd E.	- Nils, Edmund	
1001	Nim, Carl John	- Nixon, Rita Emily	
1002	Nixon, Robert	- Noey, Howard Freeman	

STANDARD FORM 135-A 1964 EDITION GSA GEN. REG. NO. 27 MAY 1964 (41 CFR) 101-11.6		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FAC ONLY		DATE OF DESTRUCTION OF RECORDS WITH EXPIRY DATES		EXPIRY AT ALTERNATE
1003	Nofchissey, Helen	-	Nonus, Edna Earl	
1004	Nonweller, Charles E.	-	Norman, Evie	
1005	Norman, Fairest	-	Norris, Roger Allen	
1005	Norris, Roland C.	-	Norton, Robert Louis	
1007	Norton, Robert Marion	-	Novick, Morris	
1008	Novick, Neil Martin	-	Munery, William Ross	
1009	Nunes, Ada Katherine	-	Nyflat, David Carl	
1010	Nygaard, Melvin Edward	-	O'Berle, Orville Wm. Jr.	
1011	O'Berle, Patricia Ann	-	O'Brien, Margaret Dolores	
1012	O'Brien, Margaret E.	-	O'Connell, Johanna V.	
1013	O'Connell, John	-	O'Day, Nancy Theresa	
1014	O'Day, Patricia Ann	-	O'Donnell, Justine Mary	
1015	O'Donnell, Karen Lynn	-	Ogan, Winona Kathryn	
1016	Ogando, Joe Richard	-	O'Hara, Robert Emmett	
1017	O'Hara, Robert Francis	-	Okrend, Harold	
1018	Okrent, Frank	-	Olhson, Lucille	
1019	Olin, Bautista R.	-	Oliver, Joy Jeanne	
1020	Oliver, Robert	-	Olsen, Lynn Richard	
1021	Olsen, Mabel Gustine	-	Olson, Paul Bernard	
1022	Olson, Paul Cornelius	-	O'Neal, Dwight Jr.	
1023	O'Neal, E. Regina	-	Onopchen, Judith L.	
1024	Onorati, Anthony Leo	-	Orell, Ruthe M.	
1025	Orella, Francis	-	Orr, Beverly Lou	
1026	Orr, Billie	-	Ortiz, Ruth Viola	
1027	Ortiz, Sabino Alberto	-	Osburn, Dorothy L.	
1028	Osburn, Earl Lee	-	Ostness, Linda C.	

STANDARD FORM 135-A GENERAL RECEIPT RECEIVED FOR THE FEDERAL GOVERNMENT		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	Agency	DATE
FRC ONLY		IN THE DEPARTMENT OF RECORDS WITH THE FOLLOWING DATE		
AGENCY		RECEIVED BY AGENCY		
1029	Ostock, Elaine Barbara	-	Ottemiller, John Henry	
1030	Otten, Alan L.	-	Overlid, Ronald E.	
1031	Overlie, Bernice G.	-	Owens, Avonne Marie	
1032	Owens, Baitie Tillman Jr.	-	Owens, Vivian Rose	
1033	Owens, Wade Lazarus	-	Pacheco, Azail Guerra	
1034	Pacheco, Barbara	-	Padilla, Julio Granados	
1035	Padilla, Kate	-	Page, Zilda F.	
1036	Pageau, Donna Ann	-	Palemire, Joseph	
1037	Palen, Barbara Ann	-	Palmer, Lynne	
1038	Palmer, M. Faye	-	Panetti, Yvonne Pearl	
1039	Pannettiere, John	-	Pappas, Konstantime E.	
1040	Pappas, Laura Lee	-	Parish, Everett S.	
1041	Parish, Fay Lee	-	Parker, Edward Kyle	
1042	Parker, Edward L.	-	Parker, Lyvonne B.	
1043	Parker, M. B.	-	Parkill, Stanley F.	
1044	Parkin, Anna Cordelia	-	Parlee, Charles W. Jr.	
1045	Parlapanides, Santa	-	Parrish, Robin Melody	
1046	Parrish, Roger Earl	-	Partiss, Gale Frances	
1047	Partlan, Joseph Edward	-	Pastewka, Lois Mae	
1048	Pastlak, Rose Anne	-	Patrick, Robert Merle	
1049	Patrick, Robert Nelson	-	Patterson, Leamon Manley	
1050	Patterson, Lee	-	Patton, Priscella	
1051	Patton, Rachel N.	-	Paulsen, Wolfgang	
1052	Paulseth, Carl Melford	-	Payne, Donal Leroy	
1053	Payne, Donald	-	Pazdor, Dolores Ann	
1054	Pazdur, Donald Walter	-	Pearsall, Priscilla Doak	

STANDARD FORM 115-A FBI FORM 115-A JANUARY 1960 EDITION GSA GEN. REG. NO. 27 5010-108-01		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	DATE
PREC ONLY		DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	REMARKS
1055	Pearsall, Raymond J.	- Peavornick, Joan Marlene	
1056	Peavy, Aaron, Benjamin	- Pedis, Richard	
1057	Pedlar, Amelia Louise	- Pelantova, Ruzena	
1058	Pelaprat, Serge Alfred L.	- Penberthy, Cora Nettie	
1059	Penberthy, Dennis Wayne	- Pennings, Pamela Elaine	
1060	Pennington, Abe Lincoln	- Pequitpequit, Porferio L.	
1061	Per, Joel	- Perez, Victor Manuel Jr.	
1062	Perez, Victor Mario	- Perkins, Twanda Lucinda	
1063	Perkins, Vala Marie	- Perry, Anna Victoria	
1064	Perry, Bertha Arthie L.	- Perry, Pauline Estelle	
1065	Perry, Pearl Anna	- Peszynski, Thomas Mitchell	
1066	Petacchi, Donald Victor	- Peters, Sylvia Ann	
1067	Peters, Tarbelle Mary	- Peterson, Edward Winfield	
1068	Peterson, Edwin	- Peterson, Rhonda Claire	
1069	Peterson, Richard	- Petrone, Henry Edward	
1070	Petrone, James	- Petty, Lyndon Dwight	
1071	Petty, Mabel	- Phail, David Harrison	
1072	Phair, Albert	- Phillippy, Steven William	
1073	Phillips, A. G.	- Phillips, George Russell	
1074	Phillips, George Samuel	- Phillips, Penola Clara	
1075	Phillips, Percy Audrey	- Phornphutkul, Kannika	
1076	Photakis, Lorraine Jane	- Pickett, Ruth Meyer	
1077	Pickett, S. A.	- Pierce, Layton Abbott	
1078	Pierce, Leamon	- Piggott, Rudolph Edward	
1079	Piggott, Adah Elizabeth	- Pincus, Gregory	
1080	Pincus, Harold	- Pionteki, John Edward	

STANDARD FORM 115-A RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE
PREC ONLY	AGENCY	DESCRIPTION OF RECORDS WITH INCLUSIVE DATES	
	1081	Piontka, Henry Ludwig	- Pitman, Mildred Katherine
	1082	Pitman, Nan Crocia	- Pix, Sandra June
	1083	Pixa, Daniel Cyril	- Playton, Stephen John
	1084	Plaza, Abelardo	- Plummer, Zola Ernestine
	1085	Plump, Anthony Julius	- Pohiman, Irvin Herbert
	1086	Pohlman, James Burton	- Poljanec, Rudolph Joseph
	1087	Polk, Aaron	- Polster, William Gregory
	1088	Polston, Albert O., Jr.	- Poole, Gwendolyn Mae
	1089	Poole, Hallie Eileen	- Poplette, Ray Ivan
	1090	Popoff, Andrew	- Porter, Jakie
	1091	Porter, James	- Posey, Kline Hershhal
	1092	Posey, Lamar Colie	- Potter, Frederick Williams
	1093	Potter, Gail Gibson	- Poussart, Alfred John, Jr.
	1094	Powell, Arlene Anne	- Powell, Judy Ruth
	1095	Powell, Jules Vincent	- Powers, Emily Frances
	1096	Powers, Emma Frances	- Prather, Cephus
	1097	Prather, Charlene Elyse	- Prentice, Ivy George
	1098	Prentice, Jack Leland	- Pretty Boy, Archie W.
	1099	Prettyman, Alyce Estelle	- Prece, Jay Murray
	1100	Price, Jean	- Pride, Booker T., Jr.
	1101	Pride, Mabel Olivia	- Prinsvalli, Ignatius J.
	1102	Prio, Maria Antonieta	- Proctor, Gus
	1103	Proctor, Hansel Edward	- Provensen, Herluf Ansgar
	1104	Provenza, Charles S.	- Pryor, Virginia Estes
	1105	Pryor, Waldron Clyde	- Puissis, Steve Kenneth
	1106	Pujdak, Warren James	- Purdunn, Robert Olin

RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		AGENCY	DATE
1107	Purdy, Addie Virginia	- Putyra, Walter Stanley	
1108	Putz, Anthony Francis	- Quay, Paul Michael	
1109	Quay, Ralph Ellis	- Quinlan, Bernard William	
1110	Quinlan, C. Loo	- Quintner, Harry Jack	
1111	Quinto, Albert Sullivan	- Radabough, Mildred E.	
1112	Radach, Dean Thomas	- Raffill, Harold Leslie	
1113	Raffin, Angelo	- Rainey, Brigid, Marie	
1114	Rainey, Callie Eugenia	- Ramel, Phyllis Ruth	
1115	Ramelb, Benjamin	- Ramquist, John Albert	
1116	Ramras, Dorothy	- Randall, Foy Robert	
1117	Randall, Frances	- Rangeloff, Alexander Jack	
1118	Renger, Agnes Alma	- Rapp, Vivian	
1119	Rapp, Wahneta Mildred	- Rath, Kenneth Watson Wm.	
1120	Rath, Larry James	- Ravely, Victoria Alline	
1121	Raven, Alfredo Enrique	- Ray, Lillard F.	
1122	Ray, Lillian	- Razor, Fred Gary	
1123	Razor, Jack Doris	- Reavere, Willie Henry	
1124	Reaves, Adah Mae	- Redding, Dorothy Jean	
1125	Redding, Earl Augusta	- Reece, Zaida Lee	
1126	Reecer, Donald Maxley	- Reed, John Arthur	
1127	Reed, John Banks	- Reeder, Greene Walton	
1128	Reeder, Hal Ferris	- Reeves, Beverly Pressler	
1129	Reeves, Billie	- Rego, Lydia M.	
1130	Rego, Manuel	- Reid, James Royce	
1131	Reid, James Samuel	- Reilly, Evelyn Trevillious	
1132	Reilly, Fairfax Addison	- Reiring, John H.	

STANDARD FORM 135-A

GSA GEN. REG. NO. 27

GSA GEN. REG. NO. 27

RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		DATE
1133 Reisler, Simon Allison - Remy, Pauline Juliette		
1134 Remy, Ramon Joseph - Reo, Sam		
1135 Reoch, George Alexander - Revels, Phyllis Jean		
1136 Revels, Ray Virgle - Reynolds, Elbert Alonzo		
1137 Reynolds, Elbert B., Jr. - Reynolds, Wilfred H.		
1138 Reynolds, Woll Carr - Rhodes, Henry Young		
1139 Rhodes, Herbert - Rice, Byron Ward		
1140 Rice, Caleria Alma - Rice, William Hunter		
1141 Rice, William I. - Richards, Joel Nevin		
1142 Richards, John - Richardson, Fritz		
1143 Richardson, G. Juanita - Richardson, Sylvia J.		
1144 Richardson, T. C. - Richter, Ivan Edward		
1145 Richter, Jack - Riddle, Burton Alan		
1146 Riddle, Callie Jane - Riedel, Kolean Elaine		
1147 Riegel, Allen Leroy - Riggott, Mable		
1148 Riggs, Adam Lewis - Riley, John Luther		
1149 Riley, John Martin - Ringchrist, George		
1150 Ringdahl, Enid Norma - Risher, Julius Rhett		
1151 Risher, Ferguson Burdine - Rittko, Linda Florence		
1152 Rittle, Delmar Vincent - Rivers, Myrtice Lucile		
1153 Rivers, Nancy Ann - Robayo, Maria Melba		
1154 Robb, Agnes - Roberson, Robert Samuel		
1155 Roberson, Rogell - Roberts, Frederica		
1156 Roberts, Frederick C. - Roberts, Mason C.		
1157 Roberts, Matilda Alice - Robertson, Clarice		
1158 Robertson, Claud Allen - Robey, Craig Wesley		
1159 Robey, Dale Vernon - Robinson, David Kirk		
1160 Robinson, David Lawrence, Jr. - Robinson, Herbert Penrose		

STANDARD FORM 115 PREPARED BY THE FEDERAL BUREAU OF RECORDS MANAGEMENT		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER DATE: 11-6-76-1 BY: [] TITLE: []	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.				DATE RECEIVED: [] BY: []	
FROM: (Name and address of agency transmitting records) CIVIL SERVICE COMMISSION 1717 H. Street N. W. Washington, D. C.				TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 210609	
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY CSC ONLY					
2. SQUARE FEET OF SPACE (CLEARED) A. OFFICE [] B. STORAGE []		3. FILING EQUIPMENT SUPPLIED A. FILE CABINETS (No.) [] B. TRANS FILES (No.) [] C. SHELVING (Lb. Ft.) []		4. COPY EXISTING RECORDS (Indicate) YES [] NO []	
5. NAME OF AGENCY CUSTODIAN OF RECORDS CSC - Mr. Arthur J. Willis		6. BUILDING AND ROOM NO. CSC Room 814H		7. TELEPHONE NO. (202) 632-6171	
8. MAY THE RECORDS BE INSPECTED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO				9. AGENCY OFFICIAL (Signature) []	
10. TITLE []		11. DATE []		12. OFFICIAL CUSTODIAN (Schedule and Item No.) []	
13. DESCRIPTION OF RECORDS WITH REFERENCE DATES (Show organizational component creating records) UNITED STATES CIVIL SERVICE COMMISSION BUREAU OF PERSONNEL INVESTIGATIONS SECURITY INVESTIGATIONS INDEX CARDS		14. OTHER COMMENTS []			

DEC 22 1975

RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		146-76-1 DATE: 12/22/75 TIME: 10:00 AM	
FROM: (Name and address of Bureau for sending records) CIVIL SERVICE COMMISSION 1717 H. Street N. W. Washington, D. C.		TO: Federal Records Center, GSA Washington National Record Center 4205 Suitland Road Suitland, Maryland 21067	
1. GIVE SECURITY CLASSIFICATION AND/OR RESTRICTIONS IN TITLE OF RECORDS, IF ANY CSC ONLY		2. SURVIVE FILE OF SPACE CITED: A. OFFICE B. STORAGE C. FILE CABINETS (N&S) D. TRANS FILED (N&S) E. SHEDDING (N&S)	
3. NAME OF AGENCY ORIGINATOR OF RECORDS CSC - Mr. Arthur J. Willis		4. ROOM AND FILE NUMBER CSC Room 814H	
5. MAY THE RECORDS BE DISCLOSED AS REQUESTED IN WRITTEN REQUESTS FROM ANYONE?		6. TITLE (OR) 65-1171	
7. AGENCY OFFICIAL (Signature)		8. TITLE	
9. AGENCY		10. DATE	
11. PREC ONLY		12. DATE OF RECEIPT	
UNITED STATES CIVIL SERVICE COMMISSION BUREAU OF PERSONNEL INVESTIGATIONS SECURITY INFORMATION - INTERNAL USE ONLY			

DEC 22 1975

STANDARD FORM 115-A FBI RECORDS SECTION U.S. DEPARTMENT OF JUSTICE WASHINGTON, D.C. 20535		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	AGENCY	DATE
FBI ONLY		1. IDENTIFICATION OF RECORDS WITHIN FBI FILE DATE		2. DATE OF RECEIPT, ETC.
1161	Robinson, Herbert Ray	-	Robinson, Mary Dean	
1162	Robinson, Mary E.	-	Robinson, Weyman Hartman	
1163	Robinson, William Andrew	-	Roche, Marie Anne	
1164	Rochel, Anthony John	-	Rodger, Wilma Carolyn	
1165	Rodgers, A. J. (IO)	-	Rodriguez, Edwina Inez	
1166	Rodriguez, Edythe Maxine	-	Roe, Ivan Deles	
1167	Roe, J. T. (IO)	-	Rogers, Charles Murdach	
1168	Rogers, Charles Neil	-	Rogers, Leon Stanley	
1169	Rogers, Leona Inez	-	Rogot, Eugene	
1170	Rogove, Edward Jerome	-	Roller, Mortimer Adolph	
1171	Roller, Nancy Margaret	-	Romblad, Walter Edward, Jr.	
1172	Rombokas, Gus Andrew	-	Ronnie, Wayne Long	
1173	Ronning, Albin Clifton	-	Rosa, Israel Colon	
1174	Rosa, Jack	-	Rose, Klaras	
1175	Rose, L. C. (IO)	-	Rosenberg, Ben	
1176	Rosenberg, Benjamin	-	Rosenzweig, Donald	
1177	Rosenzweig, Edwin Lee	-	Ross, Glenn Paul	
1178	Ross, Glo Eva	-	Ross, Vance R.	
1179	Ross, Veda Louise	-	Roth, Elenore Annette	
1180	Roth, Elinore Muriel	-	Rothenberg, Douglas Howard	
1181	Roufa, Donald Jay	-	Rowan, Julius Harry	
1182	Rowan, Karl Earl	-	Rowland, Virginia Mae	
1183	Rowland, W. J.	-	Royster, Preston Mckee	
1184	Royster, Rachel	-	Ruby, Grant Mckinley	
1185	Ruby, Harold Edmond	-	Rudov, Walter Baer	
1186	Rudow, Albert R.	-	Ruiz, Ezequiel Garcia	
1187	Ruiz, Ernesto	-	Ruiz, Theodore Daniel	

RECORDS SECTION 115-A - TWO COPIES TO - ONE COPIES TO - ONE COPY TO - ONE COPY TO		RECORDS, INITIAL AND RECEIPT (CONTINUATION)	DATE
PAC ONLY	AGENCY	DATE OF RECEIPT OF COPY, WITHIN 10 DAYS	DATE OF RECEIPT
1188	Ruotolo, Andrew Keogh	- Russ, Eunice Annette	
1189	Russ, Faith POLAY	- Russell, Jack Ely	
1190	Russell, Jack F.	- Russnogle, Ralph Owen	
1191	Russo, A. Viola	- Rutledge, Ival Eldeen	
1192	Rutledge, J. C.	- Ryan, John Montgomery	
1193	Ryan, John Norwood	- Rygwelski, Raymond Joseph	
1194	Ryhal, Claude William	- Sacco, William Joseph	
1195	Saccoach, Bernard F.	- Sagatosky, Joseph John	
1196	Sagawa, Amy Emiko	- Sainten, William Newton	
1197	St. Onge, Albert Robert	- Saldana, Isabel	
1198	Saldana, Janie	- Salper, Maurice	
1199	Salpeter, Alexander	- Sammons, Sudler Edmund	
1200	Sammons, Jr., Thaddeus Edward	- Sanante, Phillip	
1201	SAN Antonio, Alfred James	- Sandcork, Joyce Ann	
1202	Sande, Allan Rupert	- Sanders, Lila May	
1203	Sanders, Lillard Bryan	- Sandman, William John	
1204	Sandmann, Alton William	- Sangl, Dorothy Viola Marie	
1205	Sangle, Dorothy Burton	- Santoro, Eugene Charles	
1206	SANTORO, Felix Anthony	- Sargent, Miriam Fonda	
1207	Sargent, Nancy Aleta	- Satterfeal, George Allan	
1208	Satterfield, Addison	- Saunders, James Willic Jr.	
1209	Saunders, Jane	- Savelsberg, Barbara Cecilia	
1210	Savely, Betty Maxine	- Saxton, Judith Claire	
1211	Saxton, Katherine Olivia	- Scanlon, Maurice Joseph	
1212	Scanlon, Michael	- Schaefer, Cyril Jude	
1213	Schaefer, Daisy Bernardine	- Schantz, Irma Kathleen S.	
1214	Schantz, James Joseph	- Schein, Joel	

STANDARD FORM 115-A FEDERAL BUREAU OF INVESTIGATION U.S. DEPARTMENT OF JUSTICE	RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	No. 10-6	DATE
FBI ONLY	ALIAS	DATE OF RECORD RECEIVED	DATE OF RECEIPT
1215	Schell, Carol Jean	- Schiattone, John Antony	
1216	Schiava, Dean Dominic	- Schirmer, Gene Jerome	
1217	Schirmer, Harold Albert	- Schmaefsky, Lillian	
1218	Schmaele, Virginia Everett	- Schmidt, Jon Rodney	
1219	Schmidt, Joseph	- Schnalle, Walter Rodney	
1220	Schnap, Bert Frankl	- Schniedermeyer, Geraldine Laverne	
1221	Schnieders, Alice Jean	- Schonely, Barbata Jean	
1222	Schoneman, Bruce	- Schreier, Dorothy M.	
1223	Schreier, Elaine Rosalind	- Schughterman, Adice Libby	
1224	Schuck, Adam Sebastian	- Schultz, Kurt Alfred Frank	
1225	Schultz, Eannis Paul	- Schuster, Kenneth Jay	
1226	Schuster, Laura F.	- Schwartz, Marvin Peter Jr.	
1227	Schwartz, Mary	- Schwrin, William F.	
1228	Schwuchow, Edward	- Scott, Charles Kennard	
1229	Scott, Charles L.	- Scott, James Byron	
1230	Scott, James Calvert	- Scott, Raymond Dudley	
1231	Scott, Raymond Earl	- Scripture, Ira Edgar	
1232	Scripture, Lillian Estelle	- Seals, Israel	
1233	Seals, Jack Gibson	- Seay, Susie Elois	
1234	Seay, Talma Floyd	- Seelhorst, Glenn Raymond	
1235	Seelig, Albert Frederick	- Seidlitz, Willy Walther	
1236	Seidman, Aaron Bear	- Selig, Helen Adele	
1237	Selig, James Bernard	- Semiatin, Sheldon Lee	
1238	Semple, Allen William	- Seremeth, Eileen Theresa	
1239	Seren, David Edward	- Settles, Ivan Lee	
1240	Settles, J. D. (IO)	- Sexton, Toni	
1241	Sexton, Veneta Muri	- Shaffell, William Henry, Jr.	

STANDARD FORM 135-A OFFICE USE ONLY DO NOT WRITE IN THESE SPACES DO NOT DESTROY		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		DATE
FAC ONLY		FAC OFFICES RECORDS, WITHIN 10 DAYS		DATE OF RECEIPT
1242	Shaffer, Aaron	-	Shanfelter, Noreen Margaret	
1243	Shanfield, Henry	-	Shapiro, Samuel	
1244	Shapiro, Samuel A.	-	Sharpe, Virginia Wilson	
1245	Sharpe, W. T.	-	Shaw, Henry V.	
1246	Shaw, Herbert	-	Shea, John Emmett	
1247	Shea, John Francis	-	Sheehan, Evelyn Dorothy	
1248	Sheehan, Florence Belle	-	Sheldon, Byron Lee	
1249	Sheldon, Candice Jo	-	Shelton, Owen Smith	
1250	Shelton, P. L.	-	Shepard, Priscilla Marie	
1251	Shepherd, Ralph	-	Sherman, Byron Stanley	
1252	Sherman, Camilla Belle Tate	-	Sherwood, June Ann	
1253	Sherwood, Karl Hamilton	-	Shillin, Rudolph	
1254	Shilling, A. Gary (IO)	-	Shipp, Thomas Aubrey	
1255	Shipp, Thomas Elliott	-	Shoemaker, Willie	
1256	Shoemaker, Adena Eleanor	-	Short, Gwendolyn Sue	
1257	Short, Hal Elliott	-	Shreyar, Joseph	
1258	Shriber, Bonnie Lee	-	Shumaker, Syle Maxwell	
1259	Shumaker, Marcelle Geneive	-	Sicklick, Joseph	
1260	Sickman, Carole Elizabeth	-	Siemroth, Albert W.	
1261	Siems, Arnold Beuard	-	Sileo, Vincent Edward	
1262	Siler, Albert Henry	-	Silverman, Gloria Joan	
1263	Silverman, Harold	-	Simmons, Carolyn Theresa	
1264	Simmons, Carrie	-	Simmons, Robert Parks	
1265	Simmons, Robert Prince	-	Simonds, Bruce Edward	
1266	Simonds, Candice Lynn	-	Simpson, Helen Marie	
1267	Simpson, Henry	-	Sims, James Lynn	
1268	Sims, James M.	-	Singer, Mary Watkins	

AMERICAN EXPRESS 115-A 1984 EDITION FBI/DOJ/DOH/DOJ/DOH 10-101 (08) 1001 115-A		RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)	DATE
FRC ONLY		115-B REPORT OF RECORDS WITHIN 100 DAYS	115-C REPORT OF RECORDS WITHIN 100 DAYS
1269	Singer, Max	- Sipes, Phillip Shannon	
1270	Sipes, Raburn Russell	- Sivin, Mark Jay	
1271	Sivins, Alfred Lincoln	- Skidmore, Ira	
1272	Skidmore, J. L.	- Skotzko, Mary	
1273	Skow, Peter Christian	- Slater, Phyllis	
1274	Slater, R. C.	- Slicton, Robert Walker	
1275	Sliday, John Joseph	- Slozak, Robert John	
1276	Slubar, Rose Mary-Ellen	- Smallwood, Conne Roberta	
1277	Smallwood, Daniel McKelvin	- Smith, Agnes Lucille	
1288	Smith, Agnes M.	- Smith, Barge Frederick	
1279	Smith, Barnard Forrest	- Smith, Cecil Lavern	
1280	Smith, Cecil Lee	- Smith, Curtis Pythian	
1281	Smith, Curtis R.	- Smith, Esther Ellen	
1282	Smith, Dow Edgar	- Smith, Dovie Elizabeth	
1283	Smith, Esther G.	- Smith, George Edward	
1284	Smith, George Edwin	- Smith, Heinz Franz	
1285	Smith, Helen	- Smith, James Avery	
1286	Smith, James B.	- Smith, Jerry Nan	
1287	Smith, JOe	- Smith, Katherine M.	
1288	Smith, Katherine O.	- Smith, Lohra Margot	
1289	Smith, Lois	- Smith, Mary Ethelyn	
1290	Smith, Mary W.	- Smith, Olivene	
1291	Smith, Oliver	- Smith, Rich	
1292	Smith, Richard	- Smith, Rose Winifred	
1293	Smith, Roseanna Mare	- Smith, Terrence M.	
1294	Smith, Terrence P.	- Smith, Webb Kennedy	

STANDARD FORM 135-A RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		DATE
FAC ONLY		DATE
AGENCY	LETTER NUMBER OF RECORDS WITH NO DATE	DATE
1295	Smith, Webster Lee - Smitherman, William G.	
1296	Smithers, Audrey Lynette - Snead, Robert	
1297	Snead, Robert Lee - Snodgrass, Vivian R.	
1298	Snodgrass, W. T. - Snyder, Harold Kenneth	
1299	Snyder, Harold Lang - Sobrieski, Dorothy Mae	
1300	Sobrino, Josephine - Solis, Evaristo	
1301	Solis, Favian - Sommer, June Marie	
1302	Sommer, Karen Ann - Sorenson, Burton T.	
1303	Sorenson, C. Hazel L. - Soukup, William J. Jr.	
1304	Soul, Anna Marie - Sowers, Otie	
1305	Sowers, Pamela Jean - Apanlove, Edith Irene	
1306	Spann, Abraham - Spaulding, Suzanne Kay	
1307	Spaulding, Takeko - Speer, Philip Joseph	
1308	Speer, Ralph Curtis - Spencer, Heber Kerr	
1309	Spencer, Helen - Spicer, John Williams	
1310	Spicer, Edward J. - Spigel, Jakob	
1311	Spiri, Edward - Sprague, Burrell James	
1312	Sprague, Carl - Sprouffskie, Lois Anne	
1313	Sproul, Albert Russell - Stacewicz, Michael John	
1314	Stacey, Alexander Paul Jr. - Staggs, Zora Irene	
1315	Stagi, Mary Caroline - Stamataky, Harry John	
1316	Stamate, Bonnie Joan - Stanglye, Thomas Roy	
1317	Stange, Albert Lee - Stansel, Willie Perez	
1318	Stansell, Albert Fletcher - Stark, Jorena	
1319	Staek, Joseph - Stashwick, Henrietta B.	
1320	Stasi, Clarene Marie - Stearns, Suzanne Agnes	

STANDARD FORM 115-A TRANSMITTAL AND RECEIPT (CONTINUATION)		DATE
REC ONLY	RECEIVED	DATE
1321	Stearns, Theodore Joseph	- Stelle, Sophia
1322	Steele, Stanley Douglas	- Steimle Karl L.
1323	Stein, Aaron	- Steinkamp, William Leslie
1324	Steinke, Adeline Helen	- Stephens, Alfred Thomas
1325	Stephens, Alice Genus	- Stephens, William Lloyd
1326	Stephens, William Mack	- Stern, Myron Irvin
1327	Stern, Nancy Elizabeth	- Stevens, Iva Elizabeth
1328	Stevens, J. B.	- Stevenson, Johanna
1329	Stevenson, John	- Stewart, Donovan
1330	Stewart, Dora	- Stewart, Louie Clementine
1331	Stewart, Louis	- Stickel, Linda Irene
1332	Stickel, Marsh Kay	- Stimmann, Michael William
1333	Stimmel, Aylene Syble	- Stockdale, Patricia
1334	Stockdale, Raymond Alfred	- Stockenbury, Mary
1335	Stoker, Ada Marie	- Stone, Bert M.
1336	Stone, Bertha	- Stone, Vivian Mary
1337	Stone, W. Clifton, Jr.	- Story, Byers, Jr.
1338	Story, Calvin Henry	- Stover, Richard Donald
1339	Stover, Richard Edward	- Strange, Luther Johnson, Jr.
1340	Strange, Madelyne Paula	- Strecker, Angus Mathews
1341	Strecker, Jane Elizabeth	- Strickland, Twoledo
1342	Strickland, Valeria Gail	- Stromberg, Ruth Ann
1343	Stromberg, Samuel Earl	- Strucinski, Mitchell Joseph
1344	Struck, Albert Joseph	- Stuckey, Morris Paul
1345	Stuckey, Nancy Lee	- Sturis, John
1346	Sturk, Loyola Yvonne	- Sudnow, Estelle R.
1347	Sudo, Andy Frank	- Sullivan, Constance Seager

RECORDS TRANSFERRED TO THE FBI RECORDS SECTION BY THE FBI RECORDS SECTION		RECORDS TRANSFERRED TO THE FBI RECORDS SECTION BY THE FBI RECORDS SECTION	RECORDS TRANSFERRED TO THE FBI RECORDS SECTION BY THE FBI RECORDS SECTION
DATE	RECORDS TRANSFERRED TO THE FBI RECORDS SECTION BY THE FBI RECORDS SECTION	DATE	RECORDS TRANSFERRED TO THE FBI RECORDS SECTION BY THE FBI RECORDS SECTION
1348	Sullivan, Corrinne Alberta	-	Sullivan, Lynwood Burrell
1349	Sullivan, Mabel Mildred	-	Summerfield, Wilma Kay
1350	Summerford, Billy Ray	-	Sunderland, Klare Steward
1351	Sunderland, Lee Meral	-	Suter, Priscella Mae
1352	Suter, Ralph Fred	-	Sutton, Prudence Virginia
1353	Sutton, R. D.	-	Swan, Ivan Dora
1354	Swan, Jack Alden	-	Swansson, Morris
1355	Swanston, Charles	-	Sweeney, June Lee
1356	Sweeney, Karen Leigh	-	Swick, Zilpha Hazel
1357	Swickar, Deane K.	-	Swodzinski, Leo Vincent
1358	Swoffard, Juanita	-	Syrov, George K.
1359	Syth, Beatrice I.	-	Tabor, Myrtle Ellen
1360	Tabor, Nancy Margaret	-	Takahara, Thomas Tadashi
1361	Takahash, Ayaka	-	Talley, Kitty Lu
1362	Talley, Ladon Bernardine	-	Tankenson, Harry
1363	Tanker, Etta	-	Tapp, Peyton
1364	Tapp, Ralph Elliotte	-	Tasker, Neil Henry
1365	Tasker, Pamela Adel	-	Tauber, Lucienne Josephine
1366	Tauber, Manfred Berthod	-	Taylor, Charlene Yvette
1367	Taylor, Charles	-	Taylor, Floyd Mae
1368	Taylor, George Floyd	-	Taylor, Janann Ruth
1369	Taylor, Jane	-	Taylor, Martell Leroy
1370	Taylor, Martha	-	Taylor Rodolph
1371	Taylor, Roger,	-	Tayman, William Perry
1372	Taymes, Euquerio	-	Tegtmeier, William Frederick
1373	Tegtmeier, Bruce Errington	-	Tenfelder, George
1374	Teng, Evangeline Chieline	-	Terrell, Myrtle O'Neal

RECEIVED FORM 10-A
1-1-60
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

RECORDS TRANSMITTAL
AND RECEIPT
(CONTINUATION)

1-1-60
FRC ONLY

1375	Terrell, Nancy Bee	- Tessicina, Mary Theresa
1376	Tessier, Andre Edward	- Tharp, Price
1377	Tharp, Ralph Powhatan	- Thibodeau, Oscar A.
1378	Thibodeau, Pamela Florence	- Thomas, Barbara Kay
1379	Thomas, Barbara Lee	- Thomas, Elizabeth Ann
1380	Thomas, Elizabeth Anne	- Thomas, James Dunston
1381	Thomas, James E.	- Thomas, Madlyn Billie
1382	Thomas Mae	- Thomas, Roy Palmer
1383	Thomas, Roy Richard	- Thome, Randall Gustau
1384	Thome, Ray Charles	- Thompson, David Prescott
1385	Thompson, David R.	- Thompson, Harrold Evans
1386	Thompson, Harry Leland	- Thompson, Kenneth Jr.
1387	Thompson, Kenneth, Lauern	- Thompson, Raleigh Justin
1388	Thompson, Ralph	- Thompson, William Austin
1389	Thompson, William B	- Thornell, William
1390	Thorner, Albert William	- Thorsen, Elsa Katherine
1391	Thorsen, Florence T.	- Thurman, Zachary Ramsey
1392	Thurn, Donovan Murray	- Tidwell, Ruth Elaine
1393	Tidwell, S. T.	- Tilley, Myrtte
1394	Tilley, Nancy Joan	- Tims, Pearl Elizabeth
1395	Tims, Rosalind Dennis	- Tirama, Beth Ann
1396	Tirando, Esther	- Tobinas, Frances Marie
1397	Tobino, Prino Richard	- Tokuoka, Pasty Nobuko
1398	Tokus, Edwina	- Tom, Lung Mow
1399	Tom, Margaret	- Tompkins, Richard Whitfield
1400	Tompkins, Robert	- Tomplistky, Jerome
1401	Toplyn, Joseph	- Torres, Otto Joseph

MESSAGE FORM 10-A (Rev. 1-1-64) PREVIOUS EDITIONS ARE OBSOLETE	RECORD TRANSMITTAL AND RECEIPT CONTINUATION	DATE	11
1. RC ONLY	2. NAME OF THE COMMUNICATOR	3. DATE	4. BY
1402	Torres, Pablo	- Tovey, William G.	
1403	Tovi, David	- Towstik, Michael	
1404	Tout, Elbert Sawyer	- Trammell, Mary M.	
1405	Trammell, Merrill Garden	- Travis, Robert Allen	
1406	Travis, Robert B.	- Trendt, Judith Lynne	
1407	Treneman, Finetta Myrich	- Trigero, Marvin	
1408	Trigg, Albin Sigfrid	- Troiani, Shirley Rae	
1409	Troiano, Albert Vincent	- Trowsdale, Robert Phillip	
1410	Trowse, Margaret Annette	- Truant, Howard F.	
1411	Trujillo, Robert Salazar	- Tubbs, Douglas Hufh	
1412	Tubbs, Earl Ingram	- Tucker, May Dorothy	
1413	Tucker, Mary Elizabeth	- Tully, John	
1414	Tully, John P.	- Turnage, Guy P.	
1415	Turnage, Mattie E.	- Turner, Gerry H.	
1416	Turner, Gertrude	- Turner, Oswald William	
1417	Turner, Ota O.	- Turry, Leon	
1418	Tursa, Mary Jean	- Tuyford, William Robert	
1419	Tuyman, Alfred Roman	- Tyre, Woodrow Withard	
1420	Tyres, Adelaide	- Ukena, Richard Gnee	
1421	Ukens, Dorothy Juanita	- Umstead, Virginia	
1422	Umstead, Warren Gehman	- Upchurch, Katherine L.	
1423	Upchurch, Lamora Carolyn	- Urrutia, Katie H.	
1424	Urrutia, Laura Mary	- Vaggelis, Nicholas T.	
1425	Vafge, Raymond Francis	- Valentine, Duell Elbert	
1426	Valentine, Earl	- Valverde, Isabel Mae	
1427	Valverde, Javier Rivera	- Vancza, Frank Edward	

STANDARD FORM NO. 64 OFFICE OF THE DIRECTOR OF THE BUREAU OF REVENUE	RECORDS, INFORMATION AND RECEIPT CONTINUATION	DATE	PAGE
FRC ONLY	12 - NUMBER OF RECORDS KEPT	12 - DATE	12 - NUMBER OF RECORDS KEPT
	1428 Vanda, Charles 1429 Vandine, Leo A. 1430 Van Houten, James Edward 1431 Van Pelt, Veda Lynette 1432 Varana, Walter William 1433 Vasquez, Dainel Bustamanta 1434 Vaughn, McKinley Herman 1435 Veit, Augustus John 1436 Ventrice, Alphonse August 1437 Verroco, Nick Vito 1438 Vickers, Jack David 1439 Vigliotti, Johnny Marvin 1440 Vincent, Joseph A. 1441 Visco, Amerigo Ralph 1442 Vogel, Joseph 1443 Vols, Sylvester T. 1444 Voss, Sally Jo 1445 Waddell, Harold A. 1446 Wadsworth, E. J. 1447 Wagner, Josephine 1448 Waite, Aaron 1449 Waldman, Terry Benson 1450 Walker, Cecil Ray 1451 Walker, G. P. 1452 Walker, Lloyd B. 1453 Walker, V. Earl	- Vandine, Karen Dee - Van Houten, Isabel B. - Van Pelt, Thomas Robert - Varaly, Robert ANDREW - Vasquez, Daniel - Vaughn, Maxine Amos - Veiss, John Jacob - Ventress, Willie Gray - Verrochi, Nina Louise - Vickers, Ivie - Vigliotti, Alferd Vincent - Vincent, Joseph - Viscius, Wlater Peter - Vogel, Jordan Gene - Vols, Theodore Whaley - Voss, Ruth Vivian - Waddell, Giulfoed T. - Wadsworth, Dwight - Wagner, Joseph William - Waitcus, Joseph - Waldman, Stephen P. - Walker, Cecil Odeil - Walker, Furman Bonsteel - Walker, Lizzie Ruth - Walker, Ursie - Wallace, Carol Rogers	

STANDARD FORM 115-A
 PREPARED BY
 GSA GEN. REG. NO. 27
 MAY 1962 EDITION
 GSA FPMR (41 CFR) 101-11.6

RECORDS TRANSFERRAL
 AND RECEIPT
 (CONTINUATION)

1 PRE ONLY

1454	Wallace, Carole Ann	-	Wallace, Raymond Wando
1455	Wallace, Resid	-	Wallinger, Thomas B.
1456	Wallingford, Alice Rae	-	Walsh, James Roy
1457	Walsh, James Terrence	-	Walter, Robert Eugene
1458	Walter, Robert Francis	-	Walton, Dwight Edwin
1459	Walton, E. Bruce	-	Wann, Lynne Carol
1460	Waquin, Jeannette Fay	-	Ward, Joe Henry
1461	Ward, Joe John	-	Ward, John Maxwell
1462	Ward, John Shersers	-	Warlik, Anthony William
1463	Warling, Dennis Bernhard	-	Warren, Ayton Julius
1464	Warren, Barbara	-	Warren, Shirley Sue
1465	Warren, Sidney Allen	-	Washington, David B.
1466	Washington, Debra Allendra	-	Washwell, John Joseph
1467	Wasiak, Edward Joseph	-	Waters, June Lenore
1468	Waters, Karen Elaine	-	Watkins, Royce Maynard
1469	Watkins, Ruby Beatrix	-	Watson, James Kieffer
1470	Watson, James L.	-	Watt, Irene Margaret
1471	Watt, Jack Bradley	-	Way, Andrew Drue
1472	Way, Barbara Ann	-	Weaver, Cynthia Jean
1473	Weaver, D. C.	-	Webb, Deloris Marie
1474	Webb, Dena Jynnell	-	Webber, Johnny Wardell
1475	Webster, Joseph	-	Webster, John Leslie
1476	Webster, John Mark	-	Weeks, Vivian
1477	Weeks, Wallace	-	Weikum, Viola
1478	Weil, Adam	-	Weinstein, Maury V.
1479	Weinstein, Max	-	Weiser, Lucy Dublin

RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		
1480	Weiser, Marjorio	- Weitzel, Albert
1481	Welch, Calvin	- Wellborn, Stephen
1482	Wellborn, Thomas Lark	- Wells, Junior Redford
1483	Wells, Karen Ann	- Welty, Winston Richard
1484	Welts, Anna	- Wermlinger, John Lester
1485	Wermund, Edmund G.	- Wesswick, Ernest Louis
1486	West, A. C.	- West, Rhoten Hugh
1187	West, Richard	- Westman, Gus
1188	Westmoreland, William H.	- Whalen, Grace Delores
1489	Whalen, Harold	- Wheeler, David Hart
1490	Wheeler, David John	- Whesdos, Paul
1491	Whtham, Donald	- White, Albert Frank
1492	White, Albert Henry	- White, David Howard
1493	White, E. Anne	- White, James Allen
1494	White, James Alphun	- White, Margaret P.
1495	White, Marie	- White, Sara Surles
1496	White, Sarah	- Whitehead, Ronnie Olen
1497	Whitehead, Rose	- Whitley, Ivon Evelyn
1498	Whitley, J. W.	- Whitson, Murlene
1499	Whitson, Nancy Clyde	- Wibeto, Harold Arvid
1500	Wibicki, Bernardine	- Wiedmaier, Robert Carl
1501	Wiedman, Alice	- Wiggins, Theron
1502	Wiggins, Thomas Alva	- Wilcox, Myrtle V.
1503	Wilcox, Nancy Carole	- Wiley, Lynwood L.
1504	Wiley, Mable Arlene	- Wilkes, Robert
1505	Wilkes, Roderick Dhy	- Wilkinson, Muriel

RECORDS SECTION 115-A FBI BUREAU FBI FIELD OFFICE FBI LABORATORY		RECORDS SECTION 115-A FBI BUREAU FBI FIELD OFFICE FBI LABORATORY	
FBI ONLY		FBI ONLY	
1506	Will, Ada Rebecca	-	Williams, Allison K.
1507	Williams, Alma	-	Williams, Carolee
1508	Williams, Carolyn Y.	-	Williams, Clyde
1509	Williams, David A.	-	Williams, Delores
1510	Williams, Erdlean Juanita	-	Williams, Guthrie John
1511	Williams, Guy	-	Williams, James Henry
1512	Williams, James Herbert	-	Williams, Koseph L.
1513	Williams, Joseph M.	-	Williams, Lysle W.
1514	Williams, M. C.	-	Williams, Odene
1515	Williams, Odessa	-	Williams, Robert R.
1516	Williams, Robert Read	-	Williams, Thomas Wray
1517	Williams, Thomas Young	-	Williamson, Charleen Y.
1518	Williamson, Charles	-	Willingham, Phyllis C.
1519	Willingham, R. B.	-	Willis, Stanley J.
1520	Willmore, Bert Leroy	-	Wilson, Arzella Rhea
1521	Wilson, Asa Hammock	-	Wilson, Doriss J.
1522	Wilson, Dorlah Mae	-	Wilson, Harrison Ode
1523	Wilson, Harry	-	Wilson, John Sylvester
1524	Wilson, John T.	-	Wilson, Michael William
1525	Wilson, Mickey Beth	-	Wilson, Samuel Gould
1526	Wilson, Samuel Haley	-	Wiltsey, Vincent Leon
1527	Wiltshire, Alfonso Harold	-	Winenow, Frank Edwin
1528	Winer, Albert	-	Winn, Byron Tony
1529	Winn, Camilla Davis	-	Winterhalt, Durald Joseph
1530	Winterhalter, Alan Millie	-	Wise, Jose W.
1531	Wise, Joseph	-	Withers, Cynthia
1532	Withers, Dale Alan	-	Wityleben, Wm. Ernest Jr.

RECEIVED FROM THE NAME OF THE DATE RECEIVED	RECORD, INITIAL AND RECEIPT CONTRIBUTION	NAME
FRC ONLY	FRC ONLY	FRC ONLY
1533	Wityler, Charles Mann	- Wolf, Franklin Warren
1534	Wolf, Fred	- Wolff, Jonathan Hart
1535	Wolff, Joseph	- Womsiwor, Herman Moran
1536	Won, Albert Kui-Ship Jr.	- Wood, Emily Marie
1537	Wood, Emma	- Wood, Mary Kathryn
1538	Wood, Mary L.	- Woodard, Simon Carless
1538	Woodard, Solomon Lee	- Woods, Aron
1540	Woods, Arthur	- Woodvine, Richard Lyman
1541	Woods, Lillian	- Woolfitt, Jane Lillian
1542	Woolfork, Alfred Thomas	- Workman, Trulan
1543	Workman, Vaughn Heber	- Wovschin, Flora
1544	Wowak, Richard Mark	- Wright, Deanna Louise
1545	Wright, Deborah Alina	- Wright, Jimmy Wayne
1546	Wright, Jo	- Wright, Robert Kenwood
1547	Wright, Robert L.	- Wulf, Homer Eric
1548	Wulf, Jack	- Wylie, Sylbester
1549	Wylie, Theda Mae	- Yaeckel, George Albert
1550	Yager, Karen Beth	- Yaguinto, John Russell
1551	Yara, Anne Katherine	- Yatsko, William J.
1552	Yatsky, Mike	- Yelverton, Wyatt E.
1553	Yelvington, Alma Frances	- Yoo, Young Hun]
1554	Yood, Bernard	- Young, Beldew Edmunds
1555	Young, Ben	- Young, Gladoria
1556	Young, Gladys	- Young, Maribeth
1557	Young, Marie	- Young, Vonceil
1558	Young, W. A.	- Yujuico, Pedro S.
1559	Yuk, Kim Suon	- Zajicek, John James

RECORDS TRANSMITTAL AND RECEIPT (CONTINUATION)		DATE
1560	Zajicek, Joseph Julius - Zarimba, Steve Kent	
1561	Zarin, Abraham - Zeitlin, Stanley	
1562	Zeitz, Aleck - Zichwie, Julia Frances	
1563	Zick, Anne Cecelia - Zimmerman, Charles Deloso	
1564	Zimmerman, Earl C. - Zito, Isidore Anthony	
1565	Zito, James Albert - Zudyk, Theodore Victor	
1566	Zuech, Jr., Ernest - Zysjniewski, Donald Gene	

MAY 3 1976

Honorable Robert E. Hampton
Chairman
United States Civil Service Commission
Washington, DC 20415

Dear Mr. Chairman:

Thank you for your letter of April 22, 1976, requesting our concurrence in a proposal that the Civil Service Commission respond to requests for access to investigative records maintained beyond their established retention period by treating such records as having been destroyed.

Any such decision is properly a matter to be determined by the Civil Service Commission. Although we can appreciate the difficulties caused by the situation you have outlined, it is our opinion, however, that records maintained beyond an established retention period - irrespective of the reason - cannot be considered destroyed. This applies not only to your disposable records kept under the requirements of Senate Resolution 21 but also to disposable records filed with other records that must be retained for a longer period of time. For this reason, we believe that reference service on such records should be undertaken in accordance with established agency procedures for similar records not yet eligible for destruction.

Sincerely,

James E. O'Neill
JAMES E. O'NEILL
Acting Archivist
of the United States

OFFICIAL FILE:NC

DAY FILE:NC

N

LRR

HWOLFINGER/EWALKER:plw:4/30/76

CONCURRENCE: *by telephone 4/29/76 (LRR)*

by phone 4/30/76 (NC)

NCO JZW 4/29/76

THE MERIT SYSTEM

UNITED STATES CIVIL SERVICE COMMISSION

WASHINGTON, D.C. 20415

. APR 22 1976

9/1/75
4/22/76
IN REPLY PLEASE REFER TO

YOUR REFERENCE

Mr. James B. Rhoads
Archivist of the United States
National Archives and Records Service
General Services Administration
Washington, D. C. 20408

Received NAA

APR 27 1976

Dear Mr. Rhoads:

On July 25, 1975, we were informed that a revised schedule had been approved for retention of our investigative records (Job number NC-146-76-1). At that time we were also reminded of the restrictions of Senate Resolution 21 concerning destruction of such records.

Civil Service Commission investigative files established before 1960 were indexed and stored alphabetically without regard to the year in which established. Investigative files established since then have been numbered serially, generally with a new number sequence each year. These numbered files are indexed alphabetically but stored numerically.

Shortly after approval of the revised destruction schedule, we purged the Security Investigations Index of all cards showing an investigation for which a file was established but which indicated no further investigative activity had taken place since June 30, 1955. These index cards have been put in archival storage and will be held there until 1980, or later if relief is not granted from Senate Resolution 21, at which time they will be destroyed along with all alphabetical files. In the meantime, those files for which the index cards have been removed from our records system are not pulled, reviewed, or used for any official purpose.

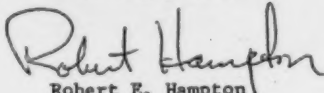
Under the Privacy Act of 1974, we must respond to individuals who request access to files which we maintain on them. These alphabetical files which are no longer indexed in our system are still maintained by us in a technical sense, and could be retrieved by the name of the individual. However, they are being maintained only because it would be administratively infeasible to sort through all the files to purge the ones older than July 1, 1955, and because we are not permitted by Senate Resolution 21 to destroy them.

THE MERIT SYSTEM—A GOOD INVESTMENT IN GOOD GOVERNMENT

With your concurrence, we will treat those files which are no longer indexed in our system of records, but are maintained as archival as though they are already destroyed in accordance with our approved schedule when we receive any kind of request for access, either under the Privacy Act or for other official purposes. These files will be considered sealed and inaccessible for any purpose except if required by the United States Senate in connection with a study and investigation of government intelligence operations within the scope of Senate Resolution 21.

We would appreciate an early response regarding your concurrence with our proposed treatment of these files.

Sincerely yours,


Robert E. Hampton
Chairman

Privacy Act or Freedom of Information Act requests were sent, or from where they received responses to such request. Individuals must furnish the following information for their records to be located and identified:

- a. Name.
- b. Date of birth.
- c. Approximate dates of Privacy Act/FOI Act correspondence between OPM and the individual.

RECORD ACCESS PROCEDURES:

Material from other Office systems of records which are exempt from certain Privacy Act requirements may be included in this system as part of a PA/FOIA case record. Such material retains its exemption if it is included in this system of records. The section of this notice titled "Systems exempted from certain provisions of the Act," which appears below, explains the exemptions for this system. Individuals wishing to request access to their records should contact the system manager at the appropriate office or region where their original Privacy Act or Freedom of Information Act request was sent, or from which they received responses to such requests. Individuals must furnish the following information for their records to be located and identified:

- a. Name.
- b. Date of birth.
- c. Approximate dates of Privacy Act/FOI Act correspondence between OPM and the individual.

Individuals requesting access must also comply with the Office's Privacy Act regulations regarding verification of identity and access to records (5 CFR 297.201 or 297.203).

CONTESTING RECORD PROCEDURES:

Material from other Office systems of records which are exempt from certain Privacy Act requirements may be included in this system as part of a PA/FOIA case record. Such material retains its exemption if it is included in this system of records. The section of this notice titled "Systems exempted from certain provisions of the Act," which appears below, explains the exemptions for this system. Individuals wishing to request amendment to their records should contact the system manager at the appropriate office or region where their original Privacy Act or Freedom of Information Act request was sent, or from which they received responses to such requests. Individuals must furnish the following information for their records to be located and identified:

- a. Name.
- b. Date of birth.

- c. Approximate dates of Privacy Act/FOI Act correspondence between OPM and the individual.

Individuals requesting amendment must also comply with the Office's Privacy Act regulations regarding verification of identity and amendment of records (5 CFR 297.201 or 297.208).

Note.—The amendment provisions for this system are not intended to permit an individual a second opportunity to request amendment of a record which was the subject of the initial Privacy Act amendment request which created the record in this system. That is, after an individual has requested amendment of a specific record in an office system under provisions of the Privacy Act, that specific record may itself become part of this system of Privacy Act/FOI Act Case Records. As individual may not subsequently request amendment of that specific record again, simply because a copy of the record has become part of this second system of Privacy Act/FOI Act Case Records.

RECORD SOURCE CATEGORIES:

Information in this system of records comes from:

- a. The individual who is the subject of the records.
- b. Office officials who respond to Privacy Act/FOI Act requests.
- c. Official personnel documents of the Office, including records from any other Office system of records included in this notice.
- d. Other sources whom the Office believes have information pertinent to an Office decision on a Privacy Act or Freedom of Information Act request.
- e. Other agencies referring the request to the Office.

SYSTEMS EXEMPTED FROM CERTAIN PROVISIONS OF THE ACT:

The Office of Personnel Management has claimed exemptions for several of its other systems of records under 5 U.S.C. 522a(k)(1), (2), (3), (5), and (6). During the course of a PA/FOIA action, exempt materials from those other systems may become part of the case record in this system. To the extent that copies of exempt records from those other systems are entered into these PA/FOIA Case Records, the Office has claimed the same exemptions for the records as they have in the original primary systems of records of which they are a part.

OPM/CENTRAL—

SYSTEM NAME:

Personnel Investigations Records.

SECURITY CLASSIFICATION:

None for the system. However, items or records within the system may have national defense/foreign policy classifications up through secret.

SYSTEM LOCATION:

a. Primary system: Deputy Associate Director, Division of Personnel Investigations, Office of Personnel Management, Washington, D.C. 20415, and the Federal Records Center, Suitland, Maryland.

b. Decentralized segments: copies of these records may exist temporarily in agencies on current employees, former employees, or on contractor employees. These copies may be located in the personnel security office or other designated offices responsible for suitability, security clearance, access, or hiring determinations on the individual. ("Agency" as used throughout this system is deemed to include legislative and judicial branch establishments as well as those in the Executive Branch).

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

- a. Current and former employees or applicants for employment in the Federal service, including agency offices of establishments in the executive, legislative, and judicial branches, and in the Government of the District of Columbia.
- b. American citizens who are current or former employees or applicants for employment with International Organizations.
- c. Individuals considered for access to classified information or restricted areas and/or security determinations as contractors, experts, instructors, and consultants to Federal programs.
- d. Individuals considered for assignment as representatives of the Federal Government in volunteer programs.
- e. Individuals who are neither applicants nor employees of the Federal Government, but who are or were involved in Federal programs under a co-operative assignment or under a similar agreement.
- f. Individuals who are neither applicants nor employees of the Federal Government, but who are or were involved in matters related to the administration of the merit system.

CATEGORIES OF RECORDS IN THE SYSTEM:

These records contain investigative information regarding an individual's character, conduct, and behavior in the community where he or she lives or lived; arrests and convictions for violations against the law; reports of interviews with present and former supervisors, coworkers, associates, educators, etc.; reports about the qualifications of an individual for a specific position and correspondence files and index cards relating to adjudication matters; reports of

agencies with law enforcement agencies, employers, educational institutions attended; reports of action after OPD or FBI Section 5(d) Full Field Investigation; Notices of Security Investigation; and other information developed from the above.

Note—This system does not include those agency records of a personnel investigative nature that do not come to the Office of Personnel Management.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM

The authorities for maintenance of the system are indicated below:

- a. Section 2, Civil Service Act of 1940—original authority.
- b. Title 5, CFR Part 5.
- c. Sections 1303, 1304, and 3301, title 5, U.S.C.
- d. Sections 7, 8(b), 8(c), 9(a), 9(c), and 14 of Executive Order 10450.
- e. Section 7702, title 5, U.S.C. (formerly Section 24 of the Veterans Preference Act of 1944, as amended).
- f. Public Law 92-261 and 5 CFR 713.216 and 713.220.
- g. Section 2163, title 42, U.S.C. (formerly the Atomic Energy Act of 1954, as amended).
- h. Section 2563, title 22, U.S.C. (formerly P.L. 87-297).
- i. Executive Order 10432, as amended.
- j. Executive Order 9397.
- k. Section 1434, title 22, U.S.C. (formerly P.L. 80-402).
- l. Section 686, title 31, U.S.C.
- m. Section 2435, title 42, U.S.C. (formerly P.L. 85-564).
- n. P.L. 85-298.
- o. Section 1874(c), title 42, U.S.C. (former section 1263, National Science Foundation Act of 1950 as amended).
- p. Section 2518, title 22, U.S.C. (formerly P.L. 87-293).
- q. In addition to the provisions cited above, there are various acts of Congress that contain implied authority for the Office to investigate, such as laws prohibiting the purchase and sale of office, holding of two offices, conspiracy and other prohibitory statutes.

PURPOSE(S)

The purposes of this system are:

- a. To provide investigatory information for determinations concerning compliance with Federal personnel regulations and for individual personnel determinations including suitability and fitness for Federal employment, access and security clearances, evaluations of qualifications, loyalty to the U.S. and evaluations of qualifications and suitability for performance of contractual services for the U.S. Government;

- b. To document such determinations;
- c. To provide information necessary for the scheduling and conduct of the required investigations;

- d. To otherwise comply with mandates and Executive orders; and
- e. These records may also be used to locate individuals for personnel research.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES FOR SUCH USES

These records and information in these records may be used in disclosing information:

- a. To designated officers and employees of agencies, offices, and other establishments in the executive, legislative, and judicial branches of the Federal Government, and the District of Columbia Government, having an interest in the individual for employment purposes, including a security clearance or access determination, and the need to evaluate qualifications, suitability, and loyalty to the United States Government.
- b. To designated officers and employees of agencies, offices, and other establishments in the executive, legislative, and judicial branches of the Federal Government, and the District of Columbia Government, when such agency, office, or establishment conducts an investigation of the individual for the purpose of granting a security clearance, or for the purpose of making a determination of qualifications, suitability, or loyalty to the United States Government, or access to classified information or restricted areas.
- c. To designated officers and employees of agencies, offices, and other establishments in the executive, legislative, and judicial branches of the Federal Government, and the District of Columbia Government, having the responsibility to grant clearances, make a determination regarding access to classified information or restricted areas, or to evaluate qualifications, suitability, or loyalty to the United States Government, in connection with performance of a service to the Federal Government under a contract or other agreement.
- d. To the intelligence agencies of the Department of Defense, the National Security Agency, the Central Intelligence Agency, and the Federal Bureau of Investigation for use in intelligence activities.
- e. To any source from which information is requested in the course of an investigation, to the extent necessary to identify the individual, inform the source of the nature and purpose of the

investigation, and to identify the type of information requested.

- f. To the appropriate Federal, State, or local agency responsible for investigating, prosecuting, enforcing, or implementing a statute, rule, regulation, or order where the Office of Personnel Management becomes aware of an indication of a violation or potential violation of civil or criminal law or regulation.

- g. To an agency, office, or other establishment in the executive, legislative, or judicial branches of the Federal Government, or the District of Columbia Government, in response to its request, in connection with the hiring or retention of an employee, the issuance of a security clearance, the conducting of a security or suitability investigation of an individual, the classifying of jobs, the letting of a contract, or the issuance of a license, grant, or other benefit by the requesting agency, to the extent that the information is relevant and necessary to the requesting agency's decision on the matter.

- h. To Federal agencies as a data source for management information through the production of summary descriptive statistics and analytical studies in support of the functions for which the records are maintained or for related studies.

- i. To provide information to a congressional office from the record of an individual in response to an inquiry from that congressional office made at the request of that individual.

- j. To another Federal agency or to a court when the Government is party to a judicial proceeding before the court.

- k. To the National Archives and Records Service (General Services Administration) for records management inspections conducted under authority of 44 U.S.C. 2904 and 2906.

- l. To the Office of Management and Budget at any stage in the legislative coordination and clearance process in connection with private relief legislation as set forth in OMB Circular No. A-19.

- m. To respond to a request for discovery or for appearance of a witness, when relevant to the subject matter involved in a pending judicial or administrative proceeding.

- n. To disclose information to officials of the Merit Systems Protection Board, including the Office of the Special Counsel, when requested in connection with appeals, special studies of the civil service and other merit systems, review of Office rules and regulations, investigations of alleged or possible prohibited personnel practices, and such other functions, e.g., as

promulgated in 5 U.S.C. 1205 and 1206, or as may be authorized by law.

e. To disclose information to the Equal Employment Opportunity Commission when requested in connection with investigations into alleged or possible discrimination practices in the Federal sector, examination of Federal affirmative employment programs, compliance by Federal agencies with the Uniform Guidelines on Employee Selection Procedures, or other functions vested in the Commission by the President's Reorganization Plan No. 1 of 1978, and to otherwise ensure compliance with the provisions of 5 U.S.C. 7201.

f. To disclose information to the Federal Labor Relations Authority or its General Counsel when requested in connection with investigations of allegations of unfair labor practices or matters before the Federal Service Impasses Panel.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:

Records are maintained in file folders and on index cards.

RETRIEVABILITY:

Records are retrieved by the name of the individual on whom they are maintained.

SAFEGUARDS:

Folders are maintained in a room with a manipulation-proof combination lock and an intrusion alarm system; or in metal file cabinets secured by three position combination locks. The index to the system and those records which are maintained on index cards are contained in covered and locked rotary Wheelindex machines. All employees are required to have an appropriate security clearance before they are allowed access to the records.

RETENTION AND DISPOSAL:

a. Index cards which show the existence of the file folder record, and the files in folders, are retained for 20 years plus the current year from the date of the most recent investigative activity. Other index cards which show no investigative record other than the completion of a clear National Agency Check or a clear National Agency Check and Inquiry, and where no investigative file folder exists, are retained for two years plus the current year.

b. Reports of action after OPM or FBI section 8(d) Full Field investigation are retained for the life of the investigative file.

c. Notices of Security Investigations are retained for 20 years. Records are destroyed by burning.

SYSTEM MANAGER(S) AND ADDRESS:

Deputy Associate Director, Division of Personnel Investigations, Office of Personnel Management, 1900 E Street, N.W., Washington, D.C. 20415.

NOTIFICATION PROCEDURE:

Individuals wishing to inquire whether this system contains information about them should contact the system manager indicated above, in writing. Individuals must furnish the following information for their records to be located and identified:

- Full name.
- Date of birth.
- Social Security Number.
- Signature.
- Any available information regarding the type of record involved.
- The category of covered individuals under which the requester believes he or she fits.

RECORD ACCESS PROCEDURES:

Specific materials in this system have been exempted from Privacy Act provisions at 5 U.S.C. 552a(c)(3) and (d), regarding access to records. The section of this notice titled "Systems exempted from certain provisions of the Act," which appears below, indicates the kinds of material exempted and the reasons for exempting them from access. Individuals wishing to request access to their records should contact the system manager indicated above, in writing. Requests should be directed only to the system manager, whether the record sought is in the primary system or in a decentralized segment. Individuals must furnish the following information for their records to be located and identified:

- Full name.
- Date of birth.
- Social Security Number.
- Signature.
- Any available information regarding the type of record involved.
- The category of covered individuals under which the requester believes he or she fits.

Individuals requesting access must also comply with the Office's Privacy Act regulations regarding verification of identity and access to records (5 CFR 297.201 and 297.203).

CONTESTING RECORD PROCEDURES:

Specific materials in this system have been exempted from Privacy Act provisions at 5 U.S.C. 552a(d), regarding amendment to records. The section of this notice titled "Systems exempted

from certain provisions of the Act," which appears below, indicates the kinds of material exempted and the reasons for exempting them from amendment. Individuals wishing to request amendment to their non-exempt records should contact the system manager indicated above, in writing. Requests should be directed only to the system manager, whether the record sought is in the primary system or in a decentralized segment. Individuals must furnish the following information for their records to be located and identified:

- Full name.
- Date of birth.
- Social Security Number.
- Signature.
- Any available information regarding the type of record involved.
- The category of covered individuals under which the requester believes he or she fits.

Individuals requesting amendment must also comply with the Office's Privacy Act regulations regarding verification of identity and amendment of records (5 CFR 297.201 and 297.206).

Note.—Where an agency retains the decentralized copy of the investigative report provided by OPM, requests for access to or amendment of such reports will be forwarded to the system manager for processing.

RECORD SOURCE CATEGORIES:

Information contained in the system was obtained from the following categories of sources:

- Applications and other personnel and security forms furnished by the individual.
- Investigative and other record material furnished by Federal agencies.
- Notices of personnel actions furnished by Federal agencies.
- By personnel investigation or written inquiry from sources such as employers, educational institutions, references, neighbors, associates, police departments, courts, credit bureaus, medical records, probation officials, prison officials, newspapers, magazines, periodicals, and other publications.

SYSTEMS EXEMPTED FROM CERTAIN PROVISIONS OF THE ACT:

This system may contain the following types of information:

- Properly classified information, obtained from another Federal agency during the course of a personnel investigation, which pertains to national defense and foreign policy. The Privacy Act, at 5 U.S.C. 552a(k)(1), permits an agency to exempt such materials from certain provisions of the Act.

- Investigatory material compiled for law enforcement purposes in connection

in the administration of the merit system. The Privacy Act, at 5 U.S.C. 552a(k)(2), permits an agency to exempt such material from certain provisions of the Act. Applications of exemption (k)(2) may be necessary to preclude the data subject's access to and amendment of the record.

c. Investigatory material maintained in connection with providing protective services to the President of the United States or other individuals pursuant to section 3056 of Title 18 of the U.S. Code. The Privacy Act at 5 U.S.C. 552a(k)(3), permits an agency to exempt such material from certain provisions of the Act.

d. Investigatory material compiled solely for the purpose of determining suitability, eligibility, or qualifications for Federal civilian employment. The Privacy Act, at 5 U.S.C. 552a(k)(3), permits an agency to exempt such material from certain provisions of the Act. Materials may be exempted to the extent that release of the material to the individual whom the information is about would:

1. reveal the identity of a source who furnished information to the Government under an express promise (granted on or after September 27, 1975) that the identity of the source would be held in confidence; or

2. reveal the identity of a source who, prior to September 27, 1975, furnished information to the Government under an implied promise that the identity of the source would be held in confidence.

e. Testing and examination materials, compiled during the course of a personnel investigation, that are used solely to determine individual qualifications for appointment or promotion in the Federal service. The Privacy Act, at 5 U.S.C. 552a(k)(6), permits an agency to exempt all such testing or examination material and information from certain provisions of the Act, when disclosure of the material would compromise the objectivity or fairness of the testing or examination process.

The Office of Personnel Management has claimed these exemptions from the requirements of 5 U.S.C. 552a(c)(3) and (d). These requirements relate to providing an accounting of disclosures to the individual whom the records are about and access to and amendment of records.

OPM/CENTRAL-10

SYSTEM NAME:

Director of Federal Executive Institute Alumni.

not scheduled

SYSTEM LOCATION:

Federal Executive Institute, Office of Personnel Management, Route 29 North, Charlottesville, Va. 22903.

CATEGORIES OF INDIVIDUALS COVERED BY THE SYSTEM:

All Federal, State, and local government employees (both current and former), international executives, former faculty and staff, and Fellowship students who have attended long term programs at the Federal Executive Institute.

CATEGORIES OF RECORDS IN THE SYSTEM:

This system contains the name, position title, office address and phone number, agency, FEI program attended and, with the approval of the individual, home address and telephone number, of alumni of FEI programs.

AUTHORITY FOR MAINTENANCE OF THE SYSTEM:

5 U.S.C. Sections 301 and 4117.

PURPOSE(S):

The Director is used by FEI alumni to maintain contact with other alumni and to provide them with information to continue their educational experiences. Copies of the Directory are made available to FEI alumni to allow them to maintain relationships developed at the Institute in order to continue educational experiences and to promote intergovernmental cooperation. These records may be used to locate individuals for personnel research.

ROUTINE USES OF RECORDS MAINTAINED IN THE SYSTEM, INCLUDING CATEGORIES OF USERS AND THE PURPOSES OF SUCH USES:

These records and information in these records may be used:

a. To disclose information to Federal agencies to assist them in planning for executive development programs.

b. To provide information to a congressional office from the record of an individual in response to an inquiry from that congressional office made at the request of that individual.

c. To provide information to the Federal Executive Institute (FEI) Alumni Association for the purpose of mailing association materials to an alumni's home or business address.

POLICIES AND PRACTICES FOR STORING, RETRIEVING, ACCESSING, RETAINING, AND DISPOSING OF RECORDS IN THE SYSTEM:

STORAGE:

In addition to its appearance in the Directory, information will be maintained on FEI mailing lists, on forms used to collect the data, and on automated media.

RETRIEVABILITY:

Records are retrieved by the name of the individual on whom they are maintained. Records may also be retrieved by agency, location, and FEI program.

SAFEGUARDS:

Records kept by FEI officials are maintained in a secured area with access limited to those authorized personnel at FEI whose duties require access. Because home addresses and phone numbers are included in the Directory, distribution of the Directory is limited to FEI Alumni, and the listed routine users. Those users are notified by a notice placed in the Directory not to make it available for commercial purposes. In addition:

a. At the request of the individual, his or her home address and phone number will not be included in the Directory;

b. At the request of the employing agency, information relating to the individual's status (i.e., position title) will be excluded from the Director.

RETENTION AND DISPOSAL:

Obsolete information will be deleted from automated records.

SYSTEM MANAGER(S) AND ADDRESS:

Registrar, Federal Executive Institute, Office of Personnel Management, Route 29 North, Charlottesville, Va. 22903.

NOTIFICATION PROCEDURE:

All individuals included in the system receive a copy of the Directory. Individuals requiring additional information about their inclusion in the system should contact the system manager named above. Individuals must furnish the following information for their records to be located and identified:

a. Name.

b. Agency.

c. FEI program(s) attended and date(s).

RECORD ACCESS PROCEDURES:

All record information in the system is included in the Directory. Individuals wishing to request access to other forms in the system which contain the same information should contact the system manager indicated above. Individuals must furnish the following information for their records to be located and identified:

a. Name.

b. Agency.

c. FEI program(s) attended and date(s).

Individuals requesting access must also follow the Office's Privacy Act regulations regarding verification of

FEDERAL EMPLOYMENT

By Philip Chandler

The Office of Personnel Management is proposing strong new safeguards for the due-process rights of people it investigates for federal jobs.

Its most far-reaching step, officials say, would sharply limit the use of derogatory information from anonymous sources.

OPM also plans to make clear to people being investigated that they have a right to see investigation reports and challenge them.

OPM proposes destroying most investigation files after seven years. They now are held for 20 years.

And it intends to set firm guidelines for agencies to decide, after investigation, whether to keep or promote someone.

OPM is circulating drafts of its proposed changes to other agencies, and asking for comments by Nov. 28. OPM officials say they would not be surprised if there were opposition from security agencies, like the FBI and the CIA.

The right to see an investigation report was specified in the 1974 Privacy Act. But few people have asked to see them, OPM says.

A decision to curtail the use of anonymous allegations was prompted by the settlement in January of a suit in a federal court in New York by a woman who had applied to be a White House fellow. In rejecting a request by OPM for a summary judgment, the judge in the case ruled that the plaintiff's Fifth Amendment (due-process) rights had been violated, because OPM would not identify and let her confront somebody who had accused her of petty thievery.

(To protect the woman's confidentiality, OPM declines now to say what happened to her after the case was settled.)

OPM is proposing now to change its procedures, and to require its investigators to try to corroborate allegations from anonymous sources with information from "open sources." If they can't get attributable information, the investigators would have to try to get their anonymous sources to "withdraw the request for confidentiality."

If the source refuses, "the information from that (anonymous)

source will not be reported" to agencies, OPM's proposed new rule says.

OPM conducts about 350,000 investigations a year for other agencies of people tentatively given jobs or promotions (or who work for contractors doing government work).

Mostly the investigations consist of checking by mail the information that job-seekers give about their previous work, education and the like.

OPM plans to state for the first time on the notice it gives applicants for warning them of investigation that they have a right to seek the investigation report and "request amendment" of it.

And OPM plans to reiterate this in a new notice notifying the applicants that an investigation report has been completed, will be on file at OPM for seven years, and may be referred to by agencies for future jobs or promotions.

OPM plans to require agencies to decide within 90 days after getting an investigation report whether to keep or promote the applicant.

If the decision was positive, the agency would be required to destroy its copies of investigation reports within 90 days, although OPM would retain a file copy for seven years.

If the decision was negative, the agency would have to tell the applicant precisely why, and give him 15 days to comment. The agency would have 90 more days to make a final decision.

And the agency would be required to keep OPM abreast of its actions so OPM could review them for compliance with the law and OPM rules.

Some members of the new Senior Executive Service are expected to sue Congress and the Carter Administration tomorrow, charging that commitments made to them have been broken.

Members of the Senior Executives Association are unhappy that Congress earlier this year put a ceiling on federal pay and cut the amount of money agencies have to give bonuses. They say the White House is behind these moves, but decline to spell out their reasons for thinking so.

The SEA will meet tonight to vote on whether to sue.

FPM Bulletin
732-4

Office of Personnel Management

FPM Bulletin 732-4

Federal Personnel Manual System
FPM Bulletin

Bulletin No. 732-4

Washington, D. C. 20415

October 10, 1980

SUBJECT: Proposed Changes to Provide Due Process in OPM-Conducted
Personnel Investigations**Action Date:** November 28, 1980**Heads of Departments and Independent Establishments:**

1. As a result of a recent Federal Court decision (*Jane Doe v. U.S. Civil Service Commission*, S.D.N.Y., January 16, 1980), and to assure compliance with the Privacy Act (codified at 5 USC 552a), the Office of Personnel Management proposes to adopt certain procedural changes in the processing of OPM-conducted personnel investigations. These procedural changes, which have been discussed with other agencies through the Interagency Advisory Group, should provide each subject of a personnel investigation adequate due process, and bring OPM's investigative files in closer compliance with the Privacy Act requirements that records on individuals be maintained only if the records are "accurate, relevant, complete, and timely." These changes are also designed to minimize the risk of personal liability for unfavorable decisions based on the results of personnel investigations.

2. Attachment 1 to this bulletin contains the changes proposed for the control, dissemination, adjudication, and notification procedures required in connection with OPM-conducted personnel investigations. Attachments 2, 3, and 4, are new or revised forms to be used in the personnel investigations process.

3. Recipients of this bulletin and other interested parties are asked to review these proposals carefully and to provide comment by November 28, 1980. Comments should be addressed to the Deputy Associate Director, Division of Personnel Investigations, Office of Personnel Management, P.O. Box 886, Washington, D.C. 20044. After review and consideration of comments received, these proposals may be published in the Federal Register.

Julie Sugarman
Julie M. Sugarman
Deputy Director

Attachments

Inquiries: Division of Personnel Investigations, Staffing Services Group, 632-6152**Code:** 732, Personnel Security Program**Distribution:** Limited**Bulletin Expires:** January 20, 1981

Attachment 1 to FPM Bulletin 732-4

This proposal is intended to change a number of procedures in the control and dissemination of investigative reports compiled by OPM, and in the adjudication and notification procedures. The changes proposed will affect user agencies as well as OPM internal procedures.

AGENCY PROCEDURES

1. OPM personnel investigations, National Agency Check (NAC), National Agency Check and Inquiries (NACI), and Background Investigation (BI), will be forwarded only to an agency security officer. The agency security officer will maintain controls on all OPM investigative reports within the agency on a strict "need-to-know" basis.

2. Within ninety (90) days of receipt of an OPM-conducted investigation, the agency will adjudicate the case, provide appropriate due process protection, and certify to OPM the action taken.

a. Favorable decisions.

(1) Background Investigation (BI):

After a tentative selection followed by a favorable decision, the agency shall, within ninety (90) days from receipt of the report of investigation, notify OPM of its decision by use of a Form DPI-73, and destroy the copy of the report of investigation. Form DPI-73 (Attachment 4) "Report of Action After OPM Investigation" will replace the Standard Form 73 and is revised to accommodate the proposals in this attachment.

(2) NAC/NACI:

Clear cases will not be forwarded to the requesting agency. In clear cases, only a notification that the NAC/NACI was processed clear will be sent. Agencies that have an agreement with OPM to receive the written inquiry replies in clear cases will be required to destroy such replies within ninety (90) days of receipt.

b. Unfavorable decisions.

(1) When an agency, as a result of information in an OPM report of investigation, changes a tentative decision (selection, promotion, grant clearance, etc.) to an unfavorable decision, it must provide the subject the specific reason(s) for the decision based on the information in the report, and allow the person a specified period of time, fifteen (15) calendar days, to respond. An extension of time to respond may be granted for sufficient cause. The subject must be given an opportunity to respond orally, in writing, or both, and to have the right of representation.

The agency must then consider all of the information received, including the subject's response, if any, before a final decision is rendered. The agency will within ninety (90) days certify to OPM by DPI-73 the action taken, and furnish to OPM a copy of any administrative review file created. An administrative review file should consist of a copy of all written challenges, replies, or documentation supplied by the subject, a written summary of any oral response, and the OPM report of investigation. If the subject fails to avail himself or herself of the opportunity to respond, documentation to that effect will be provided to OPM with the DPI-73. Where appropriate, OPM may grant an agency an extension of time beyond ninety (90) days to complete the administrative review process.

(2) When an agency is considering more than one candidate for a position and the report of investigation will be used for a qualifications determination in the final selection process, the following procedure will be used:

- An official other than the selecting official will review the reports of investigation for non-qualifications related information (i.e., information that impugns the subject's character) and remove such information from the report of investigation before the report is provided to the selector (selection panel).
- After the qualifications determination and selection has been made, the screener will re-review the complete report on the selected candidate(s). If the report of investigation is clear, the selection process will proceed.
- If the report of investigation of the selected candidate(s) contains unfavorable information, the selector will be apprised of the information and given the opportunity to reaffirm or reverse the selection(s).
- If the selection is reaffirmed, the process goes forward.
- If the selection is reversed, the agency must follow the due process procedures as outlined in 2.b.(1) above.

3. The agency may provide unclassified information from the report of investigation to the subject. However, if the agency desires to release the entire report to the subject, the agency must contact the originator of the report (OPM, FBI, DOD, etc.) and obtain permission to do so on a case-by-case basis.

NOTICE TO SUBJECT

4. Revised OPM Document #14, "Notice to Individuals Completing Federal Investigative Forms" (Attachment 2) which is provided to each subject at the time of completion of the personnel investigation forms, will contain specific language notifying individuals of their right to obtain a copy of their investigative file and to request amendment of the file.

5. OPM, upon receipt of the DPI-73 from the agency, will mail the subject of the investigation a form DPI# 6, "Notice to Individuals that a Personnel Investigation File is Being Maintained in OPM's System of Records" (Attachment 3). This new form will be used to notify the subject that an investigative file is now a part of the System of Records at OPM and explains the procedures to be followed to obtain a copy of the file.

OPM INTERNAL PROCEDURES

6. The Privacy Act provides for the granting of confidentiality to sources providing information to the Government. OPM reports of investigation historically have contained information from confidential sources. This practice is, in the opinion of the Courts, in conflict with the subject's constitutional right to confront an accuser, and may subject the disseminator of such information to perjury liability.

7. OPM proposes changing the reporting procedures of sources granted confidentiality. OPM Investigators will provide a source that requests identity protection such a pledge in obtaining the information from that source. Investigators will make every attempt to obtain or corroborate pertinent information from that source through other open sources. If the information is deemed pertinent and cannot be developed from other open sources, an attempt will be made to have the protected source withdraw the request for confidentiality. If the source refuses to withdraw the request for confidentiality, the information from that source will not be reported.

8. OPM will continue to carefully screen each report of investigation prior to release to the requesting agency to insure that all information is security/suitability related and that prohibited matters are not included in the report or otherwise reflected in the file.

9. OPM proposes changing the retention schedule of investigative files from twenty (20) to seven (7) years. This change advances the intent of the Privacy Act, which requires that records are maintained with "such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination." The seven (7) year retention will cover investigative needs and is consistent with retention periods as under the Bankruptcy Act, Fair Credit Reporting Act, and other statutes.

10. OPM will retain the master copy of the investigative report. The copy provided to the requesting agency will either be destroyed or returned to OPM. No file will be created or maintained on clear NAC/NACI cases. Further dissemination of an OPM investigative file (other than for OPM survey or research purposes) will be strictly controlled and made only for bona fide employment or security considerations.

11. OPM's Security Investigations Index (SII) retention schedule will be fifteen (15) years. The SII will continue as a central index of all personnel investigations conducted and will contain a record of the agency conducting the investigation; the agency requesting the investigation; the date of the report; and the type of investigation conducted. The fifteen (15) year index retention period will provide leads to agency records that may contain information on the subject of an investigation which is needed for coverage of Special Background Investigations that provide for fifteen (15) year coverage.

12. Copies of reports conducted by other investigative agencies that are in OPM's System of Records, as part of an investigation conducted by OPM, will be destroyed in the seven (7) year retention schedule. Copies of OPM reports that are furnished to another investigative agency as part of an investigation the other agency is conducting will be included in that agency's system of records and will be destroyed according to that agency's published destruction schedule. The OPM report may not be considered in an employment/security clearance process without specific OPM permission, once the report becomes seven (7) years old.

13. OPM will review each agency's action through the DPI-73. The action taken will be recorded in the subject's investigative file at OPM. On unfavorable decisions, the DPI-73 and the copy of the administrative review file will be postaudited to assure that appropriate due process was available to the subject of the investigation. OPM will make appropriate changes to the master file copy of the report of investigation based on information in the administrative review file.

14. OPM's Security Appraisal Program personnel will analyze the data resulting from the DPI-73 information and administrative review files. The information will be for use in evaluating the personnel investigations and security programs of Federal agencies.

NOTICE TO INDIVIDUALS COMPLETING FEDERAL INVESTIGATIVE FORMSAUTHORITY

This information is provided pursuant to Public Law 93-579 (Privacy Act of 1974), December 31, 1974, for individuals completing Federal investigative forms. The authority to collect the information on the attached form is derived from one or more of the following: Title 5, Code of Federal Regulations, section 5.2 Title 5, U.S. Code, sections 1303, 1304, and 3301; sections 8(b), 8(c), and 9(c) of Executive Order 10450; Title 42, U.S. Code, section 2455; and Title 22, U.S. Code, sections 1434 and 2585.

PURPOSES AND USES

The information you supply will be used principally as a basis for an investigation to determine your fitness for employment in the Federal service or for other employment purposes, including a security clearance and an evaluation of qualifications, suitability, and loyalty to the United States. As part of such an investigation, the Standard Form 87 (Fingerprint Chart) will be sent to the Federal Bureau of Investigation and may be retained there. This information and information developed through investigation may be furnished to designated officers and employees of agencies and departments of the Federal Government for employment purposes, including a security clearance determination, an access determination, an evaluation of qualifications, suitability, and loyalty to the U.S. Government, and a determination regarding qualifications or suitability for performing a contractual service to the Federal Government. The information may also be disclosed to any agency of the Federal Government having a working relationship with regard to Office of Personnel Management activities, to the intelligence agencies of the Federal Government, or to others having reasons as published in the Federal Register. In most instances a copy of the report of investigation will be maintained in OPM's system of records and may be used in future employment or security clearance determinations. You have the right to obtain a copy of the report and to request amendment to the file.

EFFECTS OF NONDISCLOSURE

You are not required to supply the information on the attached form. If you do not furnish the information requested, the processing of your case will be suspended, and you will receive no further consideration. If you furnish only part of the information required, the processing of your case will be attempted; however, it may be significantly delayed. If the information withheld is found to be essential to processing your case properly, you will be so informed, and your case will receive no further consideration unless you supply the missing information. Although no penalties are authorized if you do not supply the information requested, failure to supply such information could result in your not being considered for employment or in your being terminated from employment based upon information in the record. A false answer to any question on this form is punishable by law (Title 18, U.S. Code, section 1001).

INFORMATION REGARDING DISCLOSURE OF YOUR SOCIAL SECURITY NUMBER
UNDER PUBLIC LAW 93-579, SECTION 7(b)

Disclosure by you of your Social Security Number (SSN) is mandatory to obtain the services, benefits, or processes that you are seeking. Solicitation of the SSN by the United States Office of Personnel Management is authorized under provisions of Executive Order 9397, dated November 22, 1943. The SSN is used as an identifier throughout your Federal career from the time of application through retirement. It will be used primarily to identify your records that you file with the Office of Personnel Management or agencies. The SSN also will be used by the Office of Personnel Management and other Federal agencies in connection with lawful requests for information about you from your former employers, educational institutions, and financial or other organizations.

The information gathered through the use of the number will be used only as necessary in personnel administration processes carried out in accordance with established regulations and published notices of systems and records. The SSN also will be used for the selection of persons to be included in statistical studies of personnel management matters. The use of the SSN is made necessary because of the large number of present and former Federal employees and applicants who have identical names and birth dates, and whose identities can only be distinguished by the SSN.

OPN Document 14
(Revised)

NOTICE TO INDIVIDUALS THAT A PERSONNEL INVESTIGATION FILE
IS BEING MAINTAINED IN OPM'S SYSTEM OF RECORDS

The Office of Personnel Management (OPM) recently completed a personnel investigation of you, conducted for the purpose of determining your fitness for employment in the Federal service or for other employment purposes, including a security clearance and an evaluation of qualifications, suitability, and loyalty to the United States of America.

A copy of the report of Investigation will be maintained in the system of records at OPM for a period of seven (7) years and may be used in future employment or security clearance determinations in the Federal service.

Under the provision of Public Law 93-579 (Privacy Act of 1974), you have the right to obtain a copy of the report and to request amendment to the file. If you desire a copy of the investigative file you should provide your full name; date of birth; social security number; the address you desire the copy of the report to be mailed to; your signature; and send your request to:

Office of Personnel Management
Division of Personnel Investigations
P.O. Box 886
Washington, D.C. 20044
Attn: Release of Information Section

Attachment 4 to FPM Bulletin 732-4

REPORT OF ACTION AFTER OPM PERSONNEL INVESTIGATION

NAME (Last - First - Middle)		DATE OF BIRTH	SOCIAL SECURITY NO.
AGENCY (Name and Address)		DATE REPORTS FWRDED	
POSITION	APPLICANT	EMPLOYEE	CONTRACTOR
	COMPETITIVE	EXCEPTED	OTHER
AGENCY ACTION			
FAVORABLE EMPLOYMENT		REMOVED	
CLEARANCE GRANTED		RESIGNED	
CLEARANCE WITHHELD		WITHDREW	
NON-SELECTED		OTHER	
ADMINISTRATIVE REVIEW GRANTED (File Attached)		ADMINISTRATIVE REVIEW DECLINED	
INVESTIGATIVE REPORTS: RETURNED		DESTROYED	
REPORTING OFFICIAL (Signature & Title)		DATE	
DPI-73 (Revised) Chapter 732 FPM	OPM COPY	REPORT OF ACTION AFTER OPM PERSONNEL INVESTIGATION	#1

- #1 - OPM COPY
 #2 - AGENCY COPY
 #3 - REVIEW COPY

Question 4. Additional information on the scheduling of the case files in 1960.

The 1960 appraisal of the CSC investigative case files (II-NNA-3152) was based in part on a study done by a NARS staff member, Everett Alldredge, in 1958. A copy of this study is enclosed, along with comments on it made by Ms. Bess Glenn, Justice and Executive Branch (the National Archives custodial unit for permanent CSC records at that time). Generally speaking, Alldredge recommended disposal of the file, except perhaps for "a handful of cases as a sample for the serious scholar." Disposition Job No. II-NNA-3152 contains no reference to sampling, however; but the CSC manual (178-D) issued in 1962 and incorporating the provisions of II-NNA-3152 does. Nonetheless, no sampling of the file was done; and the 1976 revision of CSC disposition standards omitted the sampling provision altogether.

SA-17 August 1950		GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICE (104-3-8)	
ENDORSEMENT SHEET			
TRANSACTION: Proposed Disposition of Investigative Files of the Civil Service Commission.			
FROM	TO	DATE AND ENDORSEMENT	
MJE	WED	6/27/53. Mr. Allen and I agree with the recommendations in your Interim Report on Disposition of Investigative Files of the Civil Service Commission.	
		We have the following suggestions concerning the four collections of records concerned:	
		1. Investigative Files, 1909-1925. 165 cu. ft.	
		(1) Should be included in a list as distinct from a schedule.	
		(2) Preserve a small sampling by retaining every fiftieth case file.	
		2. Security Investigation Files, 1916-1929. 15 cu. ft.	
		(1) Should be included in a list.	
		(2) Preserve small sampling by retaining every fiftieth case file.	
		3. Investigative Files, 1929-date. 21,300 cu. ft.	
		(1) Should be included on a schedule that would apply also to future accumulations.	
		(2) Schedule should clearly set forth criteria for items to be retained. We suggest that all cases that have been appealed to the highest board of review of the Civil Service Commission (now the Loyalty Review Board) be eliminated from retention by the schedule.	
		4. Security Investigations Index, 1939-date. 1,166 cu. ft.	
		(1) We agree with your recommendation for a study of the disposal possibilities of these cards. The Commission, of course, will base its recommendations chiefly upon its administrative need for the records.	
		(2) From the view point of the NA, I see no need for preserving these records or any part of them for historical purposes, for which the samples of the case files to be retained should be adequate. Statistical data	

published by the Commission on its investigative work should be adequate for the over-all picture.

- (3) The Commission now has authority (NA Job No. 350-854, item 4) to dispose of, after three months, case files on national agency checks and inquiry cases in which no derogatory information appears. The relevant cards for those cases could also be scheduled for disposal after whatever retention period the Commission considers advisable.

Bess Glenn
Justice and Executive Branch

INSTRUCTIONS WITH RESPECT TO FURTHER CONTINUATION - If a series of endorsements or comments requires more space than that provided by the front and back of a single endorsement sheet, it should be continued on one or more consecutively numbered additional sheets. All the sheets constituting such a single series should be stapled together as a single document with sheet 1 on the top. Endorsements written after a document of a different type is added to the dossier should constitute a new series.

*Not used
in this form* 6-26-58 fha
B.H. 6/27/58

Transaction: Proposed Disposition of Investigation Files of the
Civil Service Commission

From To
NJE NRP

(Allidredge) 6-26-58. You asked for our opinion on the recommendations you make for disposal of certain investigation files of the Civil Service Commission, as presented in your "Interim Report on Disposition of Investigation Files of the Civil Service Commission."

We agree with your recommendations for the disposal of the 1903-1928 investigation files and 1916-1920 loyalty investigation files, with the exception that we believe that it might be advisable to preserve a small sample of each of these files. Perhaps every fiftieth file might be excepted from the proposed disposal authority.

In regard to the investigation files, 1928-date, you recommend that they be broken in 1958 and that in 1968 disposal should be effected on that part of the 1928-58 block of these files on which there would have been no activity in the intervening 30 years. We agree with this recommendation, and we proposed that your reservation as to the "pulling of samples and significant loyalty cases chosen by the National Archives" be implemented by excepting from the proposed disposal authority all cases that have been appealed to the highest board of review of the Civil Service Commission (now the Loyalty Review Board). This would give an adequate documentation of all the steps and procedures in investigation cases, since the retained cases, by definition, would run the entire gamut of the administrative handling of such cases.

It would result in the retention of most famous cases, since any case that attained any degree of fame would usually be appealed as high as possible. The proposed retention would be fairly easy to apply, since the file covers on these case files show the use made of the files, including all review action.

We also agree with your fourth recommendation, that a study be made within the next three years of the disposal possibilities on the security investigation index and record cards. One possibility might be to schedule for disposal, after a suitable number of years, the security investigation cards that concern national agency checks and inquiry cases in which no derogatory information appears (NA Job No. 350-S54, item 4, contains the authority for the disposal of such case files after 3 months).

The disposal authority request on the 1903-1928 investigation files and the 1916-1920 loyalty investigation files should be submitted as a list. The request on the 1928-1958 investigation files, however, should be presented as a schedule and worded, perhaps, to cover not only the 1928-1958 block but also future accumulations of these records.

Bess Glenn

INTERNAL REPORT ON
DISPOSITION OF INVESTIGATION FILES OF THE CIVIL SERVICE COMMISSION

Investigative Functions of the Commission

During most of its history the CSC has found investigations of individuals inherent in administering the merit system. Since 1903 it has had occasion to investigate applicants for employment whose fitness has been questioned because of such matters as arrest records, bad employment records, or false statements. In more recent times, investigations have been necessary in connection with appeals handled by the Commission, particularly those under the Veterans' Preference Act of 1914. The Commission also has used investigations, to the extent that its funds would permit, as part of the examination of qualifications of applicants for high-level jobs.

Since 1947, under the authority of EO 9835 and even more since the passage of PL 296 in 1952 and the issuance of EO 10450 in 1954, a major part of the Commission's investigative activity has been the conduct of background investigations as a service to departments and agencies for security clearance purposes.

Two basic types of these security clearance investigations are conducted for other agencies. They are known as full field and national agency checks and inquiries.

1. Full field or background investigations. These are to obtain full facts on the background and activities of an individual. They include:
 - a. Interviews with employers, supervisors, references, neighbors, and school authorities,
 - b. checks of police and credit records, and

c. a national agency check covering files of the House Committee on Un-American Activities, the FBI's fingerprint and other files, the intelligence files of the Armed Forces, and the files of the Commission.

The aim is to determine whether the individual is a loyal, honest, moral, and reputable citizen. Persons cannot be assigned to duties affecting the national security until such investigations are completed.

Public Laws 296 and 920 of 1952, and EO 10422 of the same year, transferred to the Commission responsibility for making full field investigations of personnel of the AEC, FGA, UNIA, PCDA, and other agencies concerned with national security as well as of U. S. citizens considered for employment on the Secretariat of the United Nations.

The completed reports of these full field investigations are submitted to the agencies which reimburse the Commission for the cost.

In addition under EO 10430 of April 27, 1954, full field investigations are made of all persons appointed to sensitive positions in departments and agencies except for several which have their own investigative staff.

2. National agency checks and inquiries. This type of investigation is in two parts. The national agency check is the same as for full field investigation: a check is made of FBI and other investigative and intelligence files to locate all available information on the individual. In addition, written inquiries (on C&C forms) are sent to local law-enforcement agencies, former employers and supervisors, references, and schools attended.

EO 10450 requires investigation of every civilian appointee to the Federal service. The scope of the investigation depends upon the importance of the position from the viewpoint of national security. National agency checks and inquiries rather than full field investigations are made of appointees to non-sensitive positions.

When adverse security or suitability information, other than loyalty, is obtained then a limited personal investigation is made by the Commission staff to obtain the facts regarding the derogatory information. The results are furnished the agency concerned with or without recommendations as to action to be taken. If the Commission's suitability requirements are not met the individual may be barred from employment for a period of time.

In both the full field investigations and the national agency checks and inquiries if adverse information is obtained relating to matters of loyalty such as sabotage, espionage, treason, sedition, membership in or affiliation with subversive organizations, or unauthorized disclosure of security information, the case is referred to the FBI for full field investigation. The completed reports of both the Commission and the FBI are furnished to the agencies concerned for decision as to whether the person's employment is consistent with the interests of the national security.

Investigation Files

The Commission's investigations are the responsibility of the Investigations Division. The case files maintained in the Central Office of that Division

reflect the Commission's investigative activities from 1903 to date, with very few cases going back before 1925.

Four collections of records are presently involved. They are:

1. Investigation Files. 1903-1925. 165 cubic feet.

Papers pertaining to applicants and Federal personnel investigated by the Civil Service Commission in its administration of the merit system. Most of the cases pertain to employees and applicants whose applications were questioned or against whom complaints were made or reports were received indicating that they were unsuitable or had violated Civil Service regulations. Cases involving complaints or appeals by individuals against agency actions are also included. Most of the cases are small, containing correspondence and notes of Commission action. The majority relate to postal employees.

2. Loyalty Investigation Files. 1916-1930. 15 cubic feet.

Papers similar to the ones described above but pertaining to the loyalty of individuals during and immediately following World War I. Cases pertain to applicants or employees reported as disloyal because of pro-German or pacifist statements, failure to buy Liberty bonds, birth or residence abroad, or the receipt of foreign decorations.

3. Investigation Files. 1928-date. 22,900 cubic feet.

Papers pertaining to applicants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veterans' Preference Act of 1944 and under the security clearance program.

Over 90% of the material post-dates 1947.

*Records
relating to
disposal
Sample
letter case
and report, etc.*

*Records
relating to
disposal of
records after
1947, of
which
there has been
no record by
the
GPO.*

The case files include the following: some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suitability and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive qualification cases; and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except MACI's for non-sensitive positions where no derogatory information is found, which are disposed of after 3 months). The cases, which are arranged alphabetically by name of individual, contain papers giving the story of each investigation from the original request or appeal to the final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Review and Appeals, and the Loyalty Review Board, are included.

The cases are filed for the most part in manila envelopes identified only by name and date of birth. Bulky cases, over 1/4th of which pertain to loyalty, are in boxes filed separately and also arranged alphabetically; they take up about 9% cubic feet of the total volume of this file.

h. Security Investigations Index. 1939-date. 1,166 cubic feet.

A master index established under authority of EO 9835 and continued under EO 10450 of all individuals investigated by the Civil Service Commission and other agencies since 1939 (and some prior to 1939).

The file is considered to be the most complete index in the country

*Who was
taken for
the "Security
Index" file?*

*Alidubg:
a check the
index within
the next 3 yrs.*

to investigations conducted on Federal employees and applicants. In many instances it is the only record available as the original investigative file is destroyed in all NACI's in which no derogatory information is found. The file consists of approximately 5½ million 4" x 6" cards. Slightly less than one million date prior to 1947. An estimated 5½ million names are carded in the file as some names have more than one card. Arranged alphabetically, the Commission cards contain name of individual, address, date and place of birth, social security number, service or serial number, position, agency, grade and salary, date of case, results of national agency checks, date and final action and related notations. Included also are the Commission's bar and flag cards in distinctive colors giving name, date and place of birth, address, position, date and cause of separation, action taken, and related information. Other cards include views sent in by other agencies on investigations in progress and completed and the Commission's record of the disposition of loyalty information received from the FBI.

Alternatives

The case files can be disposed of in either of the two following ways:

1. Break the 1928-58 files in 1958. Retain it for 30 years and then dispose what is left of it. Its bulk would have been considerably reduced by cases transferred to new files, and slightly by the pulling of samples and significant loyalty cases chosen by the National Archives. In 1988 it would then contain only cases on which there has been no activity for thirty years. These cases

would pertain to persons who had died, retired, or been separated from the service for 30 or more years. Most of the remainder of the file would pertain to individuals in non-sensitive positions who had not changed jobs in 30 or more years.

Advantages:

1. The file would be available in its entirety for 30 years so that all cases required in investigations could be withdrawn and combined with the current file.
2. Disposal could be effected in one block without weeding. This would cost very little.

OR

2. Dispose of case 75 years after the date of birth of the individual except for samples and loyalty cases chosen by the NA. This theoretically would not require breaking of the case files.

Cases would not be destroyed until the individual was 5 years past retirement age. Since the bulk of the file pertains to individuals born well after 1900 it would not be worthwhile to weed the file for another 30 years.

Advantages:

1. Cases would be kept for the period the individual is employable and for several years after in line with the practice followed for the OPF's. After 30 years the file could be greatly reduced in size by weeding out cases eligible for destruction.

2. To persons opposed to breaking the case file this solution would theoretically avoid a break.

Disadvantages:

1. Weeding would be more difficult and more expensive than the alternative of bringing forward the active cases and letting the residue "die on the vine", as envisioned by the 30 year proposal.
2. This plan would require more space and equipment than the 30 year proposal. If the security program is continued this file can be expected to grow at the rate of about 2,000 cubic feet a year. In ten years time it will be close to twice its present volume. In addition to doubling in size the file is going to become increasingly unwieldy as new cases are continually interfiled among cases going back to 1928 and relating to innumerable individuals who have long since died, retired, or left the service.

Justifications for disposal after 30 years after last action or when the individual is 75 years old.

1. Each individual's case file will have been available long enough to serve all possible investigative needs of the Commission and those of other agencies. The present lack of use of the two older collections of files is an indication that these records lose their investigative value after a 30 year lapse of time. Within the post-1928 collection of case files almost no use is now made of materials dating earlier than 1939.

2. The end results of the investigations are passed on to the agencies concerned, Boards of review and appeals, and other parts of the Commission. In the process they get digested in the Security Investigations Index. These pertaining to employees are also recorded in the Official Personnel Folders.
3. Narrative and statistical reports, budgets, minutes of meetings, hearings, and other records of Commission boards of appeal, as well as other records of the Commission and the Investigations Division give the story of the Commission's activities and functions in merit, suitability, and loyalty investigations. The collections of case files are not necessary to document these activities and functions.
4. Retention of these investigative case files would be contrary to determinations already made by the Commission and the National Archives that the OPF's do not have sufficient research value to merit retention after the period of their administrative usefulness to the Government and the individual has passed. The Commission and the National Archives have also agreed that the NACI's which locate no derogatory information are disposable after 3 months. It would seem inequitable, if not perverse, to preserve the records of the relatively small number of questionable employees and applicants and destroy those of the much larger number of reputable ones.
5. The case file can be described as the working papers of the investigative staff and like other working papers can be adjudged disposable when no longer needed by the Commission. Their "raw data" character is emphasized

*agencies in
selecting
authorities?*

by the practice of not making available many of the papers in the case file even to investigators of other agencies.

6. These papers, when they have ceased to expedite the work of the Division and the Commission, are not of the type to be made available to the public as archives. Even after a long period of time they could damage or harass individuals and their families. The records contain allegations, proven and unproven, concerning an individual's use of alcohol, indebtedness, emotional or mental stability, veracity, morality, questionable friends, criminal actions, and police records. Where criminal or fraudulent action is definitely established there may be no reason to spare the feelings of the individual or his descendants. Where the information is not definitive and is from trusted informers it does not seem that this should be made available in the future any more than it is at present.

Archival Sampling

This report has assumed the National Archives will select a handful of cases as a sample for the curious scholar. Such a sample would not be open to the public without restrictions. It is not necessary to establish at this time whether the National Archives should make a sampling. Under either of the disposal alternatives that depository would have a minimum of 20 years to make up its mind.

The more famous loyalty cases, it has been assumed, may be pulled for preservation by the National Archives. These would all be in the "over size" sub-collection previously referred to. Here, however, the National Archives

will want to give additional study to the problem, for it would be confronted with relating any kept to other files of the Commission, the courts, the FBI case files, the House Un-American Activities Committee files, the records of the various intelligence and investigative agencies, and the loyalty review boards, all of which might have gap-filling data.

Recommendations

The following recommendations are made on the investigative files discussed in this report.

RECOMMENDATION NO. 1. Dispose of 1903-1908 investigation files.

RECOMMENDATION NO. 2. Dispose of 1914-1920 loyalty investigation files.

RECOMMENDATION NO. 3. Dispose in 1958 of the 1908-1958 investigation files on which there has been activity in the intervening 30 years. (This assumes the files will be broken in 1958.)

RECOMMENDATION NO. 4. Study the security investigations index for disposal possibilities within the next three years. (This assumes the present is not the most appropriate time for the study.)

Question 5. Identification and separation of more recent files (1940 to date)

Civil Service Commission investigative case files established before 1960 were indexed and stored alphabetically without regard to the year in which the files were established. Identification and separation of the more recent case files (1940 to date) from the older files would require examination of each of over two million index cards to determine the date the case was closed, and compilation of a listing of cases closed for more than 40 years. After compiling the listing, actual separation of the case files could begin. Screening of the older case files for disposal purposes was considered in 1960, when the 30-year retention period was established, and on a number of occasions since, but rejected as too costly.

Question 6. Appraisal of the files.

Without conducting a special study, NARS cannot cite a definitive number of cases that must be examined scientifically to support an appraisal of a records series.

Appraisal of modern public records is complex. The considerations used to determine the values of 20th century records cannot be reduced to exact standards. Generally, archivists determine the long-term values of public records by evaluating (1) the evidence the records contain of the organization and functioning of the government body that produced them, and (2) the information they contain on persons, corporate bodies, things, problems, conditions, and the like, with which the government body dealt.

The most significant facts of an agency's existence - its patterns of action, its policies in dealing with all classes of matters, its procedures, and its achievements - are usually captured in a relatively small body of evidential records. Consequently, most of the larger series of records in the National Archives, such as the voluminous census schedules, passenger lists, land-entry papers, and other case files, have been accessioned primarily for the information they contain.

In appraising the value of information in public records, the archivist is not greatly concerned with the source of the records - what agency created them, or what activities resulted in their creation - but rather with the information that is in them. There are three tests by which information values of public records are judged: (1) uniqueness, (2) form, and (3) importance. The term uniqueness means that the information contained in the records is not readily available from other sources. The term form relates both to the degree to which the information is concentrated in the records and to the records' physical condition. If the records meet the tests of uniqueness and form, the archivist then considers the importance of the records, that is, the extent to which they will satisfy research needs.

The CSC investigation case files have been appraised as disposable because (1) their value lay largely in their information content, since evidence of the investigative program is found in a more compact form in agency correspondence, reports, and other policy documents; (2) the information in the more substantive files is duplicated in FBI files, since those investigations were turned over to that agency for "full field" investigation as a matter of course; and (3) the form of the file did not lend itself to research since, except for the oversize material, the straight alphabetical arrangement of the individual case files and the cumulative nature of the file (30 years) resulted in the burial of the more substantive files in thousands of routine investigations.

Thus, the analysis of the CSC investigation case files in 1960 was not based exclusively on examination of a set number of files, but rather on an analysis of the informational content of the file in the context of information available from other Federal records.

Scientific sampling of records to determine their historical value is a relatively new procedure and NARS has only limited experience with it. The current NARS appraisal of the FBI headquarters and field office case files is the only example where NARS has used scientific sampling to appraise records. The results of this effort must be presented to the U.S. District Court for the District of Columbia on November 9, 1981. In the FBI appraisal, NARS examined 5800 headquarters case files out of a universe of 5 million files; and 10,000 files in seven field offices out of a universe of 20 million files in 59 field offices.

Based on our experience with the FBI project, we estimate that for the CSC investigative records, we would need to examine 3,000 to 5,000 case files to obtain a 95% confidence level of gathering sufficient data to support recommendations. The sample would probably be a proportionate, systematic sample based on the size of each alphabetic surname letter: e.g., if the A's were ten percent of the files, the sample must include ten percent A's, and if there were 20,000 case files with A surnames, every 10th case must be examined. It is important to note that these are tentative determinations which would require more extensive review and verification before attempting a scientific sampling.

The only other example of appraisal of public records using scientific sampling is the Massachusetts Superior Court records project. This project was completed in 1979 by the Judicial Records Committee of the Massachusetts Supreme Judicial Court. In this appraisal, approximately 3500 files were examined out of a universe of some 2,700,000, or about 0.13%.

Question 7. National security value or implications of case files

The National Archives and Records Service cannot state with certainty at the present time that these files or any part thereof have no national security value or implications. However, because of the passage of time since these cases were closed, it is likely that the majority pertain to persons who have died, retired, or been separated from civil service for 30 or more years. These circumstances would probably diminish their national security value.

Certainly, if the records have national security value, NARS will withdraw its request to dispose of them. Because their national security value would be an administrative need determined by the agency, in this case OPM, NARS will work closely with OPM and with the Subcommittee to determine their national security value.

If OPM determines that there is a national security value to the files and finds a need to retain the files, NARS will do so.

Question 8. Transfer of the individual files and index to the FBI

Pursuant to 44 U.S.C. 2908, the Administrator of General Services is authorized to promulgate regulations governing the transfer of records from the custody of one executive agency to another. These regulations are incorporated in 41 CFR 101-11.409 (copy enclosed). In sum, they require the head of any executive agency to obtain prior written approval from the National Archives and Records Service for such transfers. GSA has no objections to the transfer of this file (if effected pursuant to 41 CFR 101-11.409), except to reiterate our belief that the information in the CSC case files containing adverse information relating to matters of loyalty is probably duplicated in FBI records.

PART 101-11 RECORDS MANAGEMENT

General for the recovery of any unlawfully removed records.

§ 101-11.408-4 Exclusions.

Private or personal files are not governed by these provisions. Section 101-11.202-2(d) provides the legal definition of personal papers and prescribes standards for their maintenance.

§ 101-11.409 Transfer of records from the custody of one executive agency to another

§ 101-11.409-1 Authority.

The Administrator will issue regulations governing the transfer of records from the custody of one executive agency to another (44 U.S.C. 2908).

§ 101-11.409-2 Approval.

No records shall be transferred from the custody of one executive agency to another without the prior written approval of the National Archives and Records Service except as provided in § 101-11.409-9.

§ 101-11.409-3 Agency request.

The head of any executive agency may request the transfer of records to or from his or her agency. Approval shall be requested by letter addressed to the National Archives and Records Service (NCD), in which are included:

- (a) A concise description of the records to be transferred, including the volume in cubic feet;
- (b) A statement of the restrictions imposed on the use of records;
- (c) A statement of the agencies and persons using the records and the purpose of this use;
- (d) A statement of the current and proposed physical and organizational locations of the records;
- (e) Information as to why the proposed transfer is in the best interests of the Government; and
- (f) A justification for the transfer of records more than 5 years old.

§ 101-11.409-4 Agency concurrences.

Copies of the concurrence or nonconcurrence in the transfer by the heads of any agencies concerned shall

be attached to the agency request.

§ 101-11.409-5 Records of terminated agencies

Transfers of records of executive agencies whose functions are terminated or are in process of liquidation are expressly subject to this Subpart 101-11.4 and no such transfers shall be made except in accordance with its provisions.

§ 101-11.409-6 Equipment.

Records storage equipment shall be transferred with the records contained therein in accordance with arrangements previously agreed to by the agencies concerned.

§ 101-11.409-7 Costs of transfers.

Approved transfers shall be made without reimbursement to the agency of original custody for any cost involved, except when this reimbursement is previously agreed to by the agencies concerned.

§ 101-11.409-8 Restrictions on use of records.

Whenever any records that are transferred are subject to restrictions upon their use imposed under a statute Executive order, or agency determination, these restrictions shall continue in effect after the transfer. Restrictions imposed by agency determination may be removed by agreement between the agencies concerned.

§ 101-11.409-9 Exceptions.

Prior written approval of the National Archives and Records Service is not required when:

- (a) Records are transferred to the Federal records centers or the National Archives in accordance with §§ 101-11.410 and 101-11.411.
- (b) Records are loaned for official use.
- (c) The transfer of records or functions or both is required by statute, Executive order, or Presidential reorganization plan, or by specific determinations made thereunder.

§ 101-11.410 Transfer of records to Federal records centers.

Question 9. Transfer of the CSC organizational files and index to the FBI

NARS first learned of the CSC organizational files on September 29, 1981. These records have not yet been appraised for their historical value; however, we have made arrangements to examine the records on November 3, 1981. We will forward a copy of our findings to you on completion of our examination of these files. Because we have no knowledge of the informational content of these files, we can take no position on the suitability of their transfer to the custody of the FBI. If, however, these files duplicate documents currently maintained by the FBI, we would not favor their transfer, for reasons of good records management and economy.

ADDITIONAL QUESTIONS TO AND RESPONSES FROM THE OPM

1. Please provide any documents, reports or any other information that supported, justified or documented the decision to retain the files which are the subject of this hearing for 30 years, then 20 years, and finally for 15 years.
2. Please provide any information or documents concerning the investigation and study which was done in 1960 when the 30 year retention schedule was set.
3. Please furnish the Subcommittee a copy of the current investigative guidelines used in the E.O. 10450 personnel security program which is still in operation according to testimony received at the hearing.
4. Under what authority was the index to the individual files taken out of use and stored? Please furnish any documents which relate to or substantiate this decision. Where is the index for the individual files presently being stored? Who is in control of this facility?
5. You testified that the organizational files and index are presently stored in a warehouse in Alexandria. By what authority are they being stored there? Under whose control is the warehouse where they are being stored?
6. Is there a retention schedule for the organizational files and index? If so, what is it?

7. Are there any pending, proposed, or anticipated plans for the destruction of the organizational files and its index?
8. What is OPM's position with regard to the retention or disposal of the individual records and index which are the subject of this hearing?
9. What is OPM's position with regard to the retention or disposal of the organizational files and its index?
10. What would be the number or percent of the files that you would recommend be examined in order to substantiate or verify the claim that the portion of the files which have loyalty or national security value are duplicated by FBI files? What would be a sufficient sample to accomplish this?
11. What would be the position of OPM with regard to a proposal that the individual files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
12. What would be the position of OPM with regard to a proposal that the organizational files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
13. Have the individual files or the organizational files ever been offered to the FBI for its use as an alternative to disposal? If so, when the offer was made, by whom was it made, and what was the FBI's response to said offer?



United States
**Office of
Personnel Management**
JAN 18 1982

Washington, D.C. 20415

Honorable Jeremiah Denton
Chairman, Subcommittee on
Security and Terrorism
Committee on the Judiciary
United States Senate
Washington, D.C. 20510

Dear Mr. Chairman:

I have enclosed this agency's response to the list of additional questions which you submitted to me on October 22, 1981, in connection with the October 5, 1981, hearing of your subcommittee on retention or destruction of certain of this agency's investigative files.

I hope that the information provided in the enclosures is fully responsive to your request. I would also ask that the investigations manual, "Conducting and Reporting Personnel Investigations" (FPM Supplement, Internal, 736-71), be kept "confidential."

Please contact me if I can be of any further assistance.

Sincerely,

Donald J. Devine
Director

Enclosures

HEARING - OCTOBER 5, 1981
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES: RETENTION OR DESTRUCTION?

ANSWERS TO ADDITIONAL QUESTIONS SUBMITTED BY SUBCOMMITTEE
TO THE
OFFICE OF PERSONNEL MANAGEMENT

1. Q. Please provide any documents, reports or any other information that supported, justified or documented the decision to retain the files which are the subject of this hearing for 30 years, then 20 years, and finally for 15 years.

A. The following requested material is provided in enclosure 1.

Exhibit Document

30 year retention:

- A1 - Memorandum entitled "Proposal of the Investigations Division Regarding Space Problems in the Confidential Files Unit," to Warren B. Irons from David F. Williams, dated December 5, 1958
- A2 - Memorandum entitled, "Plan to Provide Temporary Relief for the Critical Filing Problem in the Confidential Files Unit," from Mr. Crowe to Mr. Johnson (no date)
- A3 - Memorandum to Mrs. Oganovic, Johnson and Byram from David F. Williams, entitled "Disposition of Confidential File," dated June 9, 1959
- A4 - Memorandum from David F. Williams to Warren B. Irons, entitled "Disposition of Confidential Files, COID," dated July 7, 1959
- A5 - Memorandum of Discussion and Agreements Regarding Disposition of Confidential File

<u>Exhibit</u>	<u>Document</u>
A6	- Memorandum entitled "Retention Schedule - Confidential Files," from David F. Williams to William E. Byram, dated July 15, 1959
A7	- Memorandum to David F. Williams entitled "Disposition of Records," dated August 28, 1959, with SF 115, "Request for Authority to Dispose of Records" containing subsequent National Archives and Records Service approval of 30 year records retention schedule
A8	- Memorandum to the Commission from David F. Williams, dated September 2, 1959, containing Commission approval of new 30 year records retention schedule
A9	- Memorandum from W.E. Byram to Kimball Johnson, dated January 29, 1960, indicating Archivist approval of 30 year retention schedule
A10	- Memorandum from David F. Williams to the Commission, dated October 3, 1960, containing Commission approval for transfer of files to Federal Records Center
A11	- Memorandum from David F. Williams to Edward G. Campbell, dated October 18, 1960, containing agreement between Commission and NARS for transfer of records
A12	- Letter response from Edward G. Campbell, dated October 18, 1960, to A11 above
A13	- Additional material on 30 year retention schedule
20 year retention:	
B1	- Letter from Thomas W. Wadlow to Robert J. Drummond, dated August 29, 1974, proposing 15/30 year retention of files

<u>Exhibit</u>	<u>Document</u>
----------------	-----------------

- | | |
|----|--|
| B2 | - Memorandum from Robert J. Drummond to Donald J. Biglin, dated November 15, 1974, on B1 above |
| B3 | - Letter from Donald J. Biglin to Thomas W. Wadlow, dated December 9, 1974, responding to B1 above |
| B4 | - Memorandum from Robert J. Drummond and Donald J. Biglin, to the Commission, dated June 19, 1975, containing the Commission's approval of 20 year records retention schedule |
| B5 | - SF-115 indicating Archivist approval on July 22, 1975, of 20 year records retention schedule with attachments: Letter from Walter W. Stender to Donald J. Biglin, dated July 25, 1975, and Letter from Senator Mike Mansfield and Senator Hugh Scott to Arthur F. Sampson, dated February 7, 1975, concerning Senate Resolution 21 precluding destruction of investigative files - also further correspondence on Senate Resolution 21 - memorandum from Robert J. Drummond to Robert E. Hampton, dated August 10, 1976 and letter from Robert E. Hampton to Senator Mike Mansfield, dated September 2, 1976 |

15 year retention:

- | | |
|----|--|
| C1 | - Memorandum from Peter Garcia to Ann Brassier, dated March 12, 1981, with attachment |
| C2 | - Letter from Robert M. Warner to Donald J. Devine, dated June 1, 1981, with enclosures: Letter to Senator Strom Thurmond from Robert M. Warner, dated |

<u>Exhibit</u>	<u>Document</u>
----------------	-----------------

C2 contd.	June 1, 1981; SF-115 indicating Archivist approval on April 30, 1981, of 15 year records retention schedule; and related previous correspondence between Senator Strom Thurmond, Senator James O. Eastland and Alan K. Campbell
-----------	---

2. Q. Please provide any information or documents concerning the investigation and study which was done in 1960 when the 30 year retention schedule was set.
 - A. Requested material provided in Tabs A1 through A13 in enclosure 1.
3. Q. Please furnish the Subcommittee a copy of the current investigative guidelines used in the E.O. 10450 personnel security program which is still in operation according to testimony received at the hearing.
 - A. OPM's current investigative guidelines [FPM Supplement (Internal) 736-71] are provided in enclosure 2.
4. Q. Under what authority was the index to the individual files taken out of use and stored? Please furnish any documents which relate to or substantiate this decision. Where is the index for the files presently being stored? Who is in control of this facility?
 - A. The index to the individual files was deactivated and placed in storage by OPM on its own authority with the concurrence of the Archivist of the United States. This action was taken as a result of OPM's decision to treat the individual files (and therefore the index to the files) as inactive records, and not to disseminate any information from the files and index. Relevant correspondence [Memorandum from Robert J. Drummond to Robert E. Hampton, dated April 13, 1976, and letter from Robert E. Hampton to James B. Rhoads

no date / is provided in enclosure 3. The index is currently being stored at the OPM's National Agency Check and Inquiries Center in Boyers, Pennsylvania. OPM is in control of this facility.

5. Q. You testified that the organizational files and index are presently being stored in a warehouse in Alexandria. By what authority are they being stored there? Under whose control is the warehouse where they are being stored?
- A. The organizational files and index were placed in storage by the OPM on its own authority as custodian of the records. The warehouse where the files and index are stored is under OPM's control.
6. Q. Is there a retention schedule for the organizational files and index? If so, what is it?
- A. At present, there is no established retention schedule for the organizational index and files.
7. Q. Are there any pending, proposed, or anticipated plans for the destruction of the organizational files and its index?
- A. There are no pending, proposed, or anticipated plans for the destruction of the organizational files and its index.
8. Q. What is OPM's position with regard to the retention or disposal of the individual records and index which are the subject of this hearing?

- A. The new administration of OPM is currently undertaking a comprehensive study to determine the value of the investigative material in the files and their usefulness in maintaining national security before any decision is made with respect to final disposition of the files.
9. Q. What is OPM's position with regard to the retention or disposal of the organizational files and its index?
- A. The files and index will be maintained until a full review of the matter is conducted by OPM.
10. Q. What would be the number or percent of the files that you would recommend be examined in order to substantiate or verify the claim that the portion of the files which have loyalty or national security value are duplicated by FBI files? What would be a sufficient sample to accomplish this?
- A. In recent years approximately 12%-15% of the investigations uncovered derogatory information of either a suitability or loyalty nature. The suitability concerns are fully investigated by OPM whereas the loyalty cases are sent to the FBI. The FBI will either accept the investigation or return it to OPM. While more detailed statistics are not maintained on the breakdown of the 12%-15%, it is likely that only 1% or less of the investigations uncover loyalty concerns. The files

contain specific documentation which indicate which files were referred to the FBI and those which the FBI accepted. Most of the files in question originated during the 1950's. Therefore, it is likely that the actual number of investigations referred to the FBI was much greater than current experience. To estimate this percentage accurately a random sample of 1,000 files is sufficient. Based upon the results of this sample, the estimate of the percentage of FBI referred files would be within $\pm 3\%$ of the actual. That is if the survey found that 30% of the files were referred to the FBI, due to sampling error we would be 95% confident that the true percentage is between 27.2% and 32.9%.

11. Q. What would be the position of OPM with regard to a proposal that the individual files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
A. OPM would have no objection to discuss the issue with the FBI, but would not commit itself to such a change at this time.
12. Q. What would be the position of OPM with regard to a proposal that the organizational files and its index be turned over to the FBI for use in its national security/loyalty investigations?
A. See question 11.
13. Q. Have the individual files or the organizational files ever been offered to the FBI for its use as an alternative to disposal? If so, when the offer was made, by whom was it made, and what was the FBI's response to said offer?
A. Yes. An offer was made verbally by Mr. Wasel Warosh, former Chief of the Security Research and Analysis Section, former Bureau of Investigations, OPM (CSC). He was in charge of the files and its index shortly after the index was deactivated by the OPM in 1975. Mr. Warosh spoke with Mr. Gary Stoops, Chief of the Division of FBI dealing with subversive investigations. Mr. Stoops indicated at that time that the FBI would not be interested in obtaining the files or its index.

EXHIBIT A-1

U.S. GOVERNMENT,
December 5, 1958.

Re Proposal of the investigations division regarding space problems in the confidential files unit.

To: Warren B. Irons.

From: David F. Williams.

The attached study and recommendations regarding the Commission's confidential files was conducted by representatives of the Investigations Division's Administrative Section with consultation and aid by Mr. Donald Biglin, Bureau of Management Services. I asked other members of my staff to review and comment on the recommendations in view of the responsibilities of various elements of this bureau for such things as records management, space management, general planning, and financial feasibility. The comments included in this memorandum represent a composite view of the divisions and offices involved.

It is the consensus of opinion that an excellent job was done in preparing this report. In general it is believed that the plan is a good one; however, we believe there should be some modifications and there are several areas in which we think further discussion and study should be made before a final plan is decided upon.

With respect to the "preferred plan" which would provide space in the Pension Building after the establishment of Commission facilities at Eighth and E Streets, N.W., we seriously doubt that space in the Pension Building would be available. It is part of the understanding that space has been earmarked in connection with plans for the Retirement and Examining Divisions at such time as we can remove certain functions to 800 E Street. This fact would lead us to prefer the alternate plan or a modification of the alternate plan.

With respect to the figures quoted as to estimated costs and estimated savings over the years, we do not know the source of the figures and are not in a position to discuss them at this time. We believe that if serious consideration is given to adopting this proposal in its present or modified form, the Office Services Division should be afforded ample time to look into costs and to the various space possibilities.

The proposal indicates a first-year cost for equipment of \$21,000. Apparently the General Services Administration believes it would be possible for them to assist to the extent of approximately \$6,000 by making available part of the equipment which presumably they would have on hand. This matter has not been discussed with anyone from GSA by this bureau, but is merely a comment based on the statements contained in the report. Assuming this were true and assuming that the cost estimates are relatively accurate, it would mean an immediate outlay of approximately \$15,000. This does not appear practical during the fiscal year 1959 or 1960 in view of our current money situation and the action taken by the Bureau of the Budget on the Commission's 1960 request. It would, of course, be possible to program this kind of money in 1960 by reducing funds made available for other projects.

Some additional matters which we feel should be discussed and considered further are:

(1) The opinion has been expressed that perhaps a true 30-year retention schedule would be more desirable than the proposed retention schedule which ranges from 30 to 45 years. As a matter of fact, we feel that the clear cases could be disposed of much sooner. We therefore suggest that consideration be given to segregating the cases by types of action in the new file, and that clear cases be scheduled for earlier disposition.

(2) The Office Services Division has some suggestions regarding a modification of the proposed numerical system which would enable the use of smaller digits, provide for the disposal of cases at any time within a given year, and in their opinion simplify filing.

(3) In connection with the installation of open-shelf filing in Tempo D, doubt was expressed as to whether the floor load was adequate to cover the open-shelf filing in the manner proposed in the report. It is believed that an engineering study would have to be made before a final decision is agreed to.

(4) Consideration should be given to postponing the cost of establishing an open-shelf filing system until the Commission moves into its new building. We should know by June or July 1959 whether or not provision has been made in GSA's appropriation for construction or a building which the Commission will occupy.

(5) During the interim we could start breaking the files, retain the old file for a period of three to six months, then transfer the old file to GSA. We would use the

best of the filing equipment on hand to house the new files which could be placed in the space provided by the transfer of the old files to GSA.

(6) We believe the Commission should carefully consider the proposed sampling of cases to be transferred to the National Archives (Annex B, Page 3). Opening these files, even to the "serious scholar," may be an intrusion of the rights of the individual and could result in considerable embarrassment to the Commission.

(7) The purging of appealed cases for the National Archives sampling (Annex B, Page 3, Item 3) would, in our opinion, be extremely costly and time-consuming. The cost for this work has not been estimated in the report.

As indicated at the outset of this memorandum, it is our opinion that this study and report has been done in a thoroughgoing and excellent manner but we feel that further discussions are needed in several areas and that there are several reasons for postponing the installation of shelf filing. We do believe that after decisions have been made in connection with such things as retention period, filing system, space, equipment, etc., we could proceed to partially adopt the plan as for example in breaking the files. This would accomplish some of the objectives of the recommendations in that it would reduce the size of the file, establish new files, and utilize existing space pending a determination as to whether or not the Commission can plan on occupying another building at some foreseeable time in the future.

Attachments.

DIA:WGB:RWH:gep

TO: Mr. Warren B. Irons
Through: Mr. Williams
Mr. Oganovic

FROM: Kimbell Johnson

SUBJECT: RECOMMENDATIONS RESULTING FROM A STUDY OF SPACE PROBLEMS IN THE
INVESTIGATIONS DIVISION'S CONFIDENTIAL FILES UNIT

The Confidential File has grown rapidly during the past several years and at present occupies three and one-half wings of Temporary "D" Building. Previously, periodic expansion into additional space had accommodated this growth. Now the file has grown to the point where there is no space available for future expansion. Consequently, since the file cannot grow in length, it is rapidly becoming overloaded by the monthly addition of some 10,000 new files with a resulting decrease in operating efficiency.

The recommendations stated herein resulted from an exhaustive study of the Commission's Confidential Files conducted by representatives of the Investigations Division's Administrative Section with consultative aid rendered by Mr. Donald Biglin of the Bureau of Management Services and Mr. Everett Alldredge, Director, Program Development Division, The National Archives of the General Services Administration. It is the opinion of the study group that these proposals provide the best solution to the immediate storage problem confronting the Confidential Files Unit and, in addition, present the most practical and economical plan for the future retirement of the Commission's investigative files. Mr. Alldredge advised that this report was circulated about The National Archives. Its contents, therefore, represent not only the views of Mr. Alldredge as a records management expert, but the views of the professional staff of The National Archives as well.

Originally, a similar study was planned for the Security Investigations Index; however, exploration of this matter by the study group disclosed this to be unnecessary as the file is operating efficiently now and will continue to be economically serviceable for another six to ten years.

SUMMARY OF RECOMMENDATIONS

A. Break the Present File and Start a New File

The Confidential File consists of nearly two million investigative files arranged alphabetically. It is recognized that these files should not be assigned a permanent status as they lose their value from the investigative standpoint with the passage of time. For this reason, efficient records management practices dictate that a disposal schedule should be established for this file. To remove a particular category of records from an alphabetically arranged file requires the individual examination of all the files. This is a costly operation for a file of this size. Therefore, the most economical approach to the problem of providing for an orderly retirement of these investigative files is to break the present file and start a new one.

The new file would house our investigative files for the next fifteen years after which time it too would be broken and another fifteen year file started. This will permit eventual block disposal of our investigative files on a regular fifteen year basis.

Files charged out from the present file will be transferred forward (with an exception of files reviewed under provisions of P. L. 769 and those on deceased persons) to the new file. This transferring forward operation will continue for thirty years. After expiration of that period of time, the old file could be eligible for disposal after clearance of the schedule by the National Archives and the Congress as described in Annex B, as all remaining files will have been inactive for thirty years.

B. Location of the Old File

Proposals advanced for the location of the old file are described below:

Preferred Plan

Once the old file is broken it would be advantageous to have it located as close to the new file as is possible. This will be particularly important during the first five year period following the break when the old file will continue to be quite active. Sufficient space would be available for both the old and the new files in Temporary "D" Building if Wing No. 4 were made available to the Confidential Files Unit. The preferred plan, therefore, assumes that the Commission will obtain space in the building located at 8th and E Streets, N.W. This will free space in the Pension Building to which the Security Research Section, now occupying all of Wing 4 in Tempo "D" can be transferred, thus making that wing available for the new file. Wing No. 4 would be an ideal location for the new file and (using open-shelf equipment and folders) would accommodate the new file for approximately six years. Assuming that the Confidential File is still located in Tempo "D" after that time has elapsed, activity in the old file probably will have diminished to the point where its removal to cheaper storage space would be desirable. This would free additional space in Tempo "D" for continuance of the new file.

Alternate Plan

Should circumstances prevent the acquisition of Wing No. 4 for the Confidential Files Unit, General Services Administration has agreed to move the old file to the Federal Records Center in Alexandria, Virginia after it is broken. They will make three deliveries daily to the Investigations Division and give 30 minute "urgent" service on any case where urgency is specified. General Services Administration is also agreeable to allowing Investigations Division file clerks service the file if we prefer; however, the Commission would have to make its own deliveries on "urgent" cases under this arrangement.

C. Install a Numerical Filing System for the New File

A numerical filing system is recommended for the new file. The proposed method of numbering files is explained in detail in Annex D. Files prepared on new cases and those charged out from the old file will be placed in the new file. The file number will be stamped on the investigative file folder and final index card at the same time. The SII file card will then serve as a locator to the numbered folder in the Confidential File. Files will retain the same number no matter how many times they are reopened.

D. Use Open-Sheff Filing Equipment Rather Than Cabinets

A space savings upwards to 40% will be realized by using open-sheff filing equipment rather than file cabinets. In other words, if the present file were housed on open-sheff equipment it would occupy 2.1 wings instead of the 3.5 wings now required for cabinet filing. This is a significant factor to consider when it is realized that the expansion needs of the present file have created periodic space problems over the past eight years. The importance of converting to open-sheff equipment will be even more pronounced when the Commission moves into a new building.

During the course of this study, representatives of the Investigations Division visited the Army Records Facility at Ft. Holabird which recently converted their filing system from cabinets to open-sheff equipment. As a result of that conversion, their searching speed has tripled. That is only one of many economies gained by this changeover (see Annex C).

E. Use Folders Rather Than Envelopes As Containers for Investigative Files

Criticism has been received from many quarters relative to the disorderly arrangement of the investigative material in our present envelope type container. This type of container encourages disorderliness as papers are easily disarranged once they are removed from the envelope for review. Folders equipped with fasteners keep the case papers arranged in proper sequence and permit an easy review of the file. Although the savings resulting from simplifying the review of our files are real, they would be admittedly difficult to measure. It is safe to assume that these savings would offset the higher cost of the folders (see Annex C). The difference in the time required to assemble papers in a folder-type file as compared to an envelope-type file would be negligible as all forms would be pre-punched for easy insertion in the accordion fasteners.

F. Disposal of Two Special Files in Confidential Files Unit

The Confidential Files Unit houses two special files (the 1903-1928 investigative file and the 1910-1920 loyalty investigation file). Except for a few files still having administrative usefulness, they have lost their investigative value. A screening of the 1910-1920 file to withdraw and retain material of value has been completed. A similar screening of the 1903-1928 file is pending. After both these files have been purged of useful material, the remainder should be disposed of after clearance by the National Archives and Congress, as recommended in Annex B. The cost of purging these

two special files was not included in the accompanying cost analyses since this work was to be accomplished regardless of the file system decided upon.

SUMMARY OF COSTS OF IMPLEMENTING THESE RECOMMENDATIONS

The first year cost incurred to purchase open-shelf equipment, folders, file guides and chargeout cards will amount to approximately \$21,000.00. This cost will remain fairly stable over the first five-year period when the bulk of the charged out files are being transferred forward from the old to the new file. After ten years have elapsed, equipment costs will be reduced to nearly one-half of the first year's cost as the transferring forward phase will have neared completion.

Mr. Alldredge has indicated that the General Services Administration will try to give the Commission \$6,000.00 to help defray the first year cost of the new equipment. If this can be done, it means that the Commission would have to provide the difference of \$15,000.00 the first year for equipment to install a completely modern files and records management system for the Confidential Files Unit.

We are firmly convinced that the increased operating efficiency made possible by the proposed filing system will absorb the additional costs of the changeover in a matter of a few years. Our attached cost comparisons show beyond doubt that continued expansion of the present file will cause searching and filing costs to spiral higher with each passing year, will impose unreasonable requirements in terms of space and filing equipment, and will render impractical any efforts to install and operate an economical method of records disposal (see Annexa C5, C6, C7 and C10).

CONCLUSION

Specifically I ask approval of:

- (a) The new filing system described above, including the starting of the new file which would utilize a numerical filing system, open-shelf filing equipment, and folders rather than envelopes to contain investigative material.
- (b) Allocation of space in Tempo "D" Building to house both components of the file as soon as such space can be made available.
- (c) Allotment of funds in the amount of \$21,000 less any funds made available by G.S.A. to provide equipment for the new filing system for the first year's operation.

ANNEX INDEX

- Annex A1 - Comparison of factors in breaking the file and continuing unending expansion.
- A2 - Comparison of alphabetical and numerical filing systems.
- A3 - Comparison of factors in open-shelf and file cabinet filing systems.
- A4 - Comparison of Kraft confidential envelope and Kraft folder.
- Annex B - Disposing the file.
- Annex C - Summary of costs of proposed and present filing systems projected over a ten-year period.
- C1 - Summary of projected costs of new file system.
- C2 - Comparative costs of open-shelf and file cabinet equipment.
- C3 - Comparative costs of folders vs envelopes.
- C4 - Comparative costs of chargeout cards and guides.
- C5 - Comparative searching costs in new and present systems.
- C6 - Comparative costs of filing miscellaneous items in new and present systems.
- C7 - Comparative costs of filing new cases in new and present system.
- C8 - Cost of extra SII searches under new system.
- C9 - Cost of numbering folders and index cards under new system.
- C10 - Savings realized by eliminating cost of expanding the present file.
- Annex D - Consideration of factors involved in a numerical filing method for the proposed confidential file.
- Annex E - Illustration of blocking scheme.

COMPARISON OF FACTORS IN BREAKING THE PRESENT
FILE OR CONTINUING UNENDING EXPANSION

ANNEX A1

Breaking File

Unending Continuation

- | | |
|---|---|
| 1. Permits assignment of a disposal schedule for the entire file. | 1. Prevents establishing a disposal schedule as the entire file remains active. |
| 2. Permits removal of the entire file to cheaper storage space after activity in the file diminishes. | 2. Expensive storage space is required as the entire file remains active. |
| 3. Will permit eventual block disposal of approximately 1½ million records at a cost of 50 cents per cubic foot. | 3. Block disposal is impossible. The file can only be "weeded" of a certain category of records at a cost of \$2.50 per cubic foot. On this basis, to weed our present file one time would cost approximately \$56,000. |
| 4. Eliminates pressing need for immediate expansion. | 4. Requires periodic expansion throughout the entire file which does not provide a permanent solution to space problems (see Cost Annex C10). |
| 5. Searching and filing costs in the broken file remain static. | 5. Searching and filing costs continue to increase as the file expands. |
| 6. The broken file can be stored in three wings instead of 3½ wings by removing empty cabinets necessary for expansion. | 6. The unending file will continue to grow and spread into additional wings which increases travel time and raises costs. |

COMPARISON OF ALPHABETICAL AND NUMERICAL
FILING SYSTEMS FOR INVESTIGATIVE FILES

ANNEX A2

Alphabetical

Numerical

- | | |
|--|---|
| 1. Simplist method of filing known. | 1. Simple system but not complete in itself as an alphabetical index is required to locate files. The SII will perform this function. If the index card is lost the folder may be lost. |
| 2. Guides are not fixed; must be added or removed to meet changes in file. | 2. Once established, guides need not be added or removed to meet changes in size of file. |

(CONTD) COMPARISON OF ALPHABETICAL AND NUMERICAL
FILE SYSTEMS FOR INVESTIGATIVE FILES

<u>Alphabetical</u>	<u>Numerical</u>
3. More time is required to search a lettered file.	3. Less time is required for reading numbers.
4. More misfiles occur in our alphabetical file as letters are easily transposed.	4. Numbers are less likely to be transposed and misfiles are noted more easily.
5. Difficult to break for disposition as all folders must be reviewed to insure proper disposition.	5. Much easier to break as the cut-off can be made by number.
6. Requires frequent shifting of records for expansion.	6. Requires no shifting of records as new files are added on the end.
7. Requires alphabetizing and inter-filing of all chargeouts and new cases added.	7. New files and chargeouts from the broken file will be assigned consecutive numbers and added to the end of the file virtually eliminating the risk of a misfile and added alphabetizing costs (See Cost Annex <u>C7</u>).
8. Difficult to inventory.	8. Easily inventoried either by sight or numerical sampling.
9. Provides a low degree of security as any particular file can be located by an unauthorized individual or employee.	9. Provides a high degree of security as a particular file would be extremely difficult to find without first searching the locator index.
10. Requires more training for new personnel.	10. Requires little training.
11. Loose papers can be filed automatically.	11. Loose papers will have to be first searched through the locator index before filing (See Annex <u>CB</u>).

COMPARISON OF FACTORS IN OPEN-SHELF AND FILE
CABINET FILING SYSTEMS

<u>Open-Shelf Equipment</u>	<u>File Cabinets</u>
1. Annual cost of equipment will amount	1. No cost for equipment as "cast-off"

ANNEX A3

COMPARISON OF FACTORS IN OPEN-SHELF AND FILE
(CONTD) CABINET FILING SYSTEMS

Open-Shelf Equipment

to \$9000.00 for first few years and eventually diminish to \$5000.00 per year.

2. Shelving requires dismantling costs for moving to new locations.
3. The floor area required for shelf equipment is 40% less than for file cabinets. 80 linear feet of records require 12 square feet.
4. Files can be retrieved at a rate of 55 per hour..
5. Files can be returned at a rate of 144 per hour.
6. Visual inventory of records and chargeouts is possible.
7. Untidiness in keeping records may be easily seen.
8. Reduces employee fatigue as records are easily accessible.

File Cabinets

cabinets are utilized in the Confidential Files Unit.

2. File cabinets may be moved more readily and cheaply.
3. 80 linear feet of records require 20.8 square feet.
4. Files can be retrieved at a rate of 18 per hour.
5. Files can be returned at a rate of 60 per hour.
6. Inventory of records and chargeouts requires much more time because it requires the opening of file cabinet drawers.
7. Untidiness is hidden from immediate view.
8. Requires travel over a larger floor area and opening file cabinet drawers.

COMPARISON OF KRAFT CONFIDENTIAL ENVELOPEAND KRAFT FOLDERANNEX A4Selection FactorsEnvelopeFolder

Cost	\$9.00 per thousand	\$62.68 per thousand
Durability	Fair-subject to bursting and tearing	Good
Flexibility for changing titles, salvaging	Poor	Good

COMPARISON OF KRAFT CONFIDENTIAL ENVELOPE(CONTD) AND KRAFT FOLDER

<u>Selection Factors</u>	<u>Envelope</u>	<u>Folder</u>
Filing space requirements per hundred	2 Inches	2 Inches
Maximum capacity	1 Inch	1 Inch

Folders with acco fasteners permit the separation of the investigative reports material from other miscellaneous papers which simplifies the review of the file. Other advantages of folders over envelopes are they are easier to work with and speed up filing productivity; they present a much better appearance; and they permit utilization of a blocking scheme which greatly reduces the incidence of misfiles.

DISPOSING THE FILE

The Commission's investigations are the responsibility of the Investigations Division. The case files maintained in the Central Office of that Division reflect the Commission's investigative activities from 1903 to date, with very few cases going back before 1928.

Four collections of records are presently involved. They are:

1. Investigation Files. 1903-1928. 165 cubic feet.

Papers pertaining to applicants and Federal personnel investigated by the Civil Service Commission in its administration of the merit system. Most of the cases pertain to employees and applicants whose applications were questioned or against whom complaints were made or reports were received indicating that they were unsuitable or had violated Civil Service regulations. Cases involving complaints or appeals by individuals against agency actions are also included. Most of the cases are small, containing correspondence and notes of Commission action. The majority relate to postal employees.

2. Loyalty Investigation Files. 1916-1920. 15 cubic feet.

Papers similar to the ones described above but pertaining to the loyalty of individuals during and immediately following World War I. Cases pertain to applicants or employees reported as disloyal because of pro-German or pacifist statements, failure to buy Liberty bonds, birth or residence abroad, or the receipt of foreign decorations.

3. Investigation Files. 1928 date. 22,500 cubic feet.

Papers pertaining to applicants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veterans' Preference Act of 1944 and under the security clearance program. Over 90% of the material post-dates 1947.

The case files include the following: 'some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suitability and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive qualification cases; and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except NACI's for non-sensitive positions where no derogatory information is found, which are disposed of after 3 months). The cases, which are arranged alphabetically by name of individual, contain papers giving the story of each investigation from the original request or appeal to the final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Review and Appeals, and the Loyalty Review Board, are included.

The cases are filed for the most part in manila envelopes identified only by name and date of birth. Bulky cases, over 3/4ths of which pertain to loyalty, are in boxes filed separately and also arranged

THIS STATEMENT WAS PREPARED BY MR. ALLDREDGE
AND MISS DREWRY OF THE GENERAL SERVICES
ADMINISTRATION.

alphabetically; they take up about 936 cubic feet of the total volume of this file.

4. Security Investigations Index. c. 1916-date. 1,166 cubic feet.

A master index established under authority of EO 9835 and continued under EO 10450 of all individuals investigated by the Civil Service Commission and other agencies since 1939 (and some prior to 1939). The file is considered to be the most complete index in the country to investigations conducted on Federal employees and applicants. In many instances it is the only record available as the original investigative file is destroyed in all NACI's in which no derogatory information is found. The file consists of approximately 6½ million 4" x 6" cards. Slightly less than one million date prior to 1947. An estimated 5½ million names are carded in the file as some names have more than one card. Arranged alphabetically, the Commission cards contain name of individual, address, date and place of birth, social security number, service or serial number, position, agency, grade and salary, date of case, results of national agency checks, date and final action and related notations. Included also are the Commission's bar and flag cards in distinctive colors giving name, date and place of birth, address, position, date and cause of separation, action taken, and related information. Other cards include views sent in by other agencies on investigations in progress and completed and the Commission's record of the disposition of loyalty information received from the FBI.

Justification for disposing files after 30 years following last action

1. Each individual's case file will have been available long enough to serve all possible investigative needs of the Commission and those of other agencies. The present lack of use of the two older collections of files is an indication that these records lose their investigative value after a 30 year lapse of time. Within the post-1928 collection of case files almost no use is now made of materials dating earlier than 1939.
2. The end results of the investigations are passed on to the agencies concerned, Boards of review and appeals, and other parts of the Commission. In the process they get digested in the Security Investigations Index. Those pertaining to employees are also recorded in the Official Personnel Folders.
3. Narrative and statistical reports, budgets, minutes of meetings, hearings, and other records of Commission boards of appeal, as well as other records of the Commission and the Investigations Division give the story of the Commission's activities and functions in merit, suitability, and loyalty investigations. The collections of case files are not necessary to document these activities and functions.
4. Retention of these investigative case files would be contrary to determinations already made by the Commission and the National Archives that the OPF's do not have sufficient research value to merit retention after the period of their administrative usefulness to the Government and the

individual has passed. The Commission and the National Archives have also agreed that the NACI's which locate no derogatory information are disposable after 3 months. (NA Job No. 350-S54, item 4). It would seem inequitable, if not perverse, to preserve the records of the relatively small number of questionable employees and applicants and destroy those of the much larger number of reputable ones.

5. The case file can be described as the working papers of the investigative staff and like other working papers can be adjudged disposable when no longer needed by the Commission. Their "raw data" character is emphasized by the practice of not making available many of the papers in the case file even to investigators of other agencies.
6. These papers, when they have ceased to expedite the work of the Division and the Commission, are not of the type to be made available to the public as archives. Even after a long period of time they could damage or harass individuals and their families. The records contain allegations, proven and unproven, concerning an individual's use of alcohol, indebtedness, emotional or mental stability, veracity, morality, questionable friends, criminal actions, and police records. Where criminal or fraudulent action is definitely established there may be no reason to spare the feelings of the individual or his descendants. Where the information is not definitive and is from unnamed informers it does not seem that this should be made available in the future any more than it is at present.

Archival Sampling

The National Archives, which acts as the agent of the Congress under the Records Disposal Act of 1943, has indicated a desire to make an archival sampling of three of these records collections prior to their destruction. Such samplings would be for the serious scholar, designed to illustrate how the Federal Government handled certain transactions, and would be subject to strong restrictions on access.

The archival sampling would be as follows:

1. From the 1903-1928 investigative file, preserve every fiftieth case.
2. From the 1916-1920 loyalty investigation file, preserve every fiftieth case.
3. From the 1928-1958 confidential file (assuming it will be broken) preserve those cases which have been appealed to the highest board of review of the Civil Service Commission.
4. From the security investigations index, 1939-date, no archival sampling is desired.

Recommendations:

The following recommendations are made to take care of the disposition of the investigative files discussed in this section of the report:

1. That the investigative file, 1903-1928, and the loyalty investigations file, 1916-1920, be purged of any material still having administrative usefulness and the remainder submitted to the National Archives on a disposal list, which when approved by the Congress would be destroyed except for every fiftieth case.
 2. That the confidential file, 1928-to date, be scheduled (so as to apply to future accumulations) so that cases on which there had been no activity for 30 years could be eligible for disposal after clearance of the schedule by the National Archives and the Congress. This schedule would provide for the permanent retention of cases that had been appealed to the USCSC Loyalty Review Board, and its predecessors or successors.
-

SUMMARY OF COMPARATIVE COST STATISTICS FOR NEW AND PRESENT FILING SYSTEMS

In addition to the monetary savings which will eventually be realized, the new filing system offers these other significant advantages:

Established a disposal schedule for our investigative files.

Permits removal of the old files to cheaper storage space when the bulk of the active files have been transferred forward to the new file.

Realizes a space savings upwards to 40 percent by using open-shelf equipment.

Reduces operating costs as files are more accessible and easier to service.

Permits use of folders which present a better appearance than envelopes and makes the files much easier to review.

Permits use of a numerical filing system which reduces the number of misfiles, provides a high degree of security, increases productivity and requires little training for new employees.

These advantages more than justify the added \$21,000.00 annually for 5 years, cut ½ after 10 years, equipment cost necessary for the installation of the new filing system. This cost will drop as the number of active files brought forward from the present file decreases. After the new file has been in operation for eight years, the bring forward phase will be virtually completed and from then on annual equipment costs will be approximately \$12,000 per year.

The savings to be realized are in operation costs. By the eighth year operation costs under the new system and the old system would be approximately the same. Thereafter, however, savings will begin to be realized under the new system. For example, after ten years, operation costs under the new system will be approximately \$7,000 a year as compared with approximately \$28,000 a year if the present system were to be retained. The difference represents a savings of \$21,000 per year. This savings will not only permit the expenditure of \$12,000 in equipment for the new system but will realize an additional savings of \$9,000. After the ten year period, with each succeeding year operating costs would continue to increase in some degree if the present system were retained. However, under the new system it can be anticipated that the operating costs will remain near the \$7,000 level reached after the tenth year. The savings thus realized in operations under the new system after ten years offsets by a considerable amount the cost of equipment.

Chart I on the following page illustrates comparative equipment and operations cost differences of both filing systems projected over a ten year period.

Chart II shows the progressive decline of equipment and operations costs for the new system.

Chart III shows the progressive decrease in equipment costs by items for the new system.

Chart IV shows the comparative differences in operations costs for both systems over the first ten year period.

Annexa C thru C10 are furnished as supporting documentation on equipment and operations costs for both filing systems.

BUREAU OF MANAGEMENT SERVICES

OFFICE OF DIRECTOR

Memorandum of discussion and agreements regarding disposition of Confidential File, Investigations Division, Bureau of Departmental Operations.

A meeting was held at 2:30 PM Friday, May 27, 1959 with David F. Lawton, Assistant Director, Bureau of Departmental Operations, in his office and was attended by: David F. Williams, Director, Bureau of Management Services Kimbell Johnson, Chief, Investigations Division Hugh P. Crowe, Chief, Administrative Section, COID W. Earl Byram, Chief, Office Services Division Carlton Gloyd, Chief, Records Admin. Sect., OSD Walter T. Pumphrey, Management Analyst.

Three plans as set forth in the attachment "Disposition of Confidential File" were discussed. All of these plans contemplate breaking (i.e. ceasing to file new cases in) the present alphabetical Confidential File as of June 30, 1959; starting a new file, as of July 1, 1959, on a numerical chronological basis to permit of orderly disposition; and establishing a 30-year retention schedule for the file.

The advantages and disadvantages of each of the plans was discussed at some length and the following agreements reached:

(1) Break the present file as of June 30, 1959.

(2) Start a new file as of July 1, 1959 on a numerical chronological basis, number of case to be shown on Security Index card.

(3). Use file folders instead of envelopes for the new file. (Chief, Office Services Division will procure appropriate folders for this purpose).

(4). Office Service Division to separate the 85 empty file cabinets in Wing No. 6, Tempo Bldg., D, to start the new file. Investigations Division estimates that this move will provide sufficient cabinets to hold all new cases (50,000) for the next six months.

(5). Within this period of time the Bureau of Departmental Operations and Office Services Division will jointly review the space situation in the Pension Building looking toward moving the Security Research Section from Tempo Bldg., D to Pension Building and making Wing 4 in Tempo D available for expansion of the new file.

(6). If this space (Wing 4) does not become available Office Services Division will consider feasibility of gradually separating the remaining 259 empty cabinets in Wings 1, 2, and 3 for the new file and rearranging the 2610 full cabinets into these wings.

(7). Since the new numerical method of filing is most efficient and economical when used with open-shelf filing equipment we will, as resources permit, commence buying open-shelf equipment as required by growth of the new file for a period of six years. This is the maximum time the files will be retained hereafter.

(8). After 5 years the old file will be transferred to GSA Federal Records Center with a retention schedule of 30 years from breaking points.

(9). After six years, the oldest year of the new file will be transferred to GSA Federal Records Center and each year thereafter so that the new file will contain not less than 5, nor more than 6 years of the latest cases.

(10). Reopened cases will be up-dated, assigned new file numbers and filed in current file when it is necessary to recall such cases from Federal Records Center.

NOVEMBER 18, 1958.

To: William E. Byram.

From: Carlton A. Gloyd.

Subject: Contents on recommendations resulting from a study of space problems in the investigations division's confidential file unit.

Investigations Division should be commented for their excellent job in preparing this report.

Their proposals for solving the immediate storage problem and the eventual retirement of the Confidential File can be improved upon by consideration of the following proposals.

Establish a 30 year retention schedule instead of the proposed schedule that ranges from 15 to 30 years.

For the following numerical system. Precede each case number with 59 for fiscal year 1959 and 60 for fiscal year 1960, et cetera. This system will enable us to use smaller digits, provide for disposal of cases at any time within a given year and simplify filing.

Do not use the same number for reopened files or cases as this practice will defeat the main purpose for numerical filing, i.e., facilitation of disposal of older files.

Do not install open-shelf filing in Tempo D. The floor load, there, is not adequate to carry open shelf filing in the manner proposed by ID. The expected economies will not result if it is installed. Dust and Dirt would also be problems in Tempo D.

Postpone the cost of open-shelf filing until we move into our new building. Then, we can save space and expedite searching and filing with open shelf filing.

Use the best of file equipment on hand to house new files.

Retain old file for a period of 3 to 6 months after the present file is broken. Then, transfer the old file to GSA. Part of the space saved by this transfer could be used to house the new file. The best equipment can also be retained.

Use a smaller area than all of Wing 4, Tempo D for the new file as it will be at least 6 years to fill the entire wing.

EXHIBIT A-2

U.S. GOVERNMENT.

To: Mr. Lawton.

From: Mr. Crowe.

Subject: Plan to provide temporary relief for the critical filing problem in the confidential files unit.

The space and filing problems associated with our Confidential File have reached the critical stage since the audit report was submitted six months ago. Over 180 file cabinets in Wing No. 2 are filled beyond their capacity making it practically impossible to interfile new cases. In view of the fact that an immediate decisions on the audit report recommendations seems unlikely, an interim plan is being submitted for your consideration which will temporarily reduce the number of filing actions required in the present file.

Credit for the proposed plan can be attributed to an inquiry made by Mr. Walter Pumphrey. While making a study of the audit recommendations for the Bureau of Management Services he asked if space could be found to start a new file in one of the existing Wings in CFU. This remark prompted us to take an inventory of the file cabinets located in Wing No. 6. A physical check of the 397 file cabinets located in this Wing disclosed that eighty-five were empty. Fifty-nine of the empty cabinets are interspersed throughout the file. It would be necessary to reorganize all cabinets in the Wing to separate these empties. If this was done, we could break the present file immediately and have file cabinets and space available to store all new investigative files received for approximately six months. This would reduce by 50,000 the number of files we would be forcing into many overcrowded file drawers during this period. Therefore, as an interim step to provide temporary relief to the congested condition of our Confidential File we recommend that the following actions be taken:

- (1) Request the Office Services Division to separate the eighty-five empty cabinets from the others in Wing No. 6.
- (2) Break the present file immediately.
- (3) Place all new investigative files received in the empty cabinets in Wing No. 6.
- (4) Use the recommended Initial Digit numbering system on each investigative envelope and index card received.

An added justification for this plan would be that it will give us an opportunity to test the adaptability of the recommended numerical filing system and other changes connected with establishing a new file. If our previous audit recommendations are not approved we will always be able to transfer the new investigative files received to the alphabetical file as the subjects name will be on each file envelope. If, following expiration of the six month period, space is made available for the installation of open-shelf filing equipment, we will make the changeover from envelopes to folders and assign each new folder the same number that appeared on the file envelope.

EXHIBIT A-3

JUNE 9, 1959.

DAVID F. WILLIAMS.

Disposition of Confidential File.

Attached for your information is a copy of "Memorandum of discussion and agreements regarding disposition of Confidential File" based on meeting held in Mr. David F. Lawton's office on May 27, 1959.

Attachment.

Above memo sent to Mr. Oganovic, Mr. K. Johnson, Mr. Byram.

EXHIBIT A-4

JULY 7, 1959.

To: Warren B. Irons.

From: DAVID F. WILLIAMS.

Subject: Disposition of confidential files, COIDA.

As you know the growth of the Confidential File has received considerable thought in recent years in an effort to establish a realistic, effective and self-operating retention schedule.

The file presently contains about two million investigative files, occupies 3½ wings in Tempo Building D and is growing at the rate of some 100,000 new files

each year. It consists of papers pertaining to applicants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veterans Preference Act and under the security clearance program. Records in the file date back to 1928 but 90 percent of the material post-dates 1947.

A study of the Confidential File was made by representatives of the Administrative Section, Investigations Division last year. Mr. Everett Alldredge, Director, Program Development Division, The National Archives, participated in this study as consultant.

A report of the findings and recommendations of the group was submitted to the Directors, Bureau of Departmental Operations and Bureau of Management Services in October 1958.

Since the Confidential File had been set up on an alphabetical basis the cost of purging old files on a chronological basis would be prohibitive.

It was recommended, therefore, that filing in the present file be discontinued and a new file be started on a numerical-chronological basis. This would permit the establishment of a retention schedule for the file and its orderly disposition.

It was also recommended that in the new file folders rather than envelopes be used and that open-shelf filing equipment be used instead of file cases in order to facilitate filing and searching.

These findings and recommendations were reviewed in the Office of Management and discussed with representatives of the Investigations Division and Office Services Division.

On May 27 a meeting was held with Dave Lawton in his office to discuss this matter and try and reach some conclusions as to the best steps to take. This meeting was attended by myself, Kimball Johnson, Hugh Crowe, Earl Byram, Carlton Gloyd and Walter Pumphray. At the meeting agreement was reached on the following points:

- (1) Break (cease filing in) the present file as of June 30, 1959.
- (2) Start a new file as of July 1, 1959 on a numerical chronological basis, number of case to be shown on Security Index card.
- (3) Use file folders instead of envelopes for the new file. (Chief, Office Services Division will procure appropriate folders for this purpose).
- (4) Office Services Division to separate the 85 empty file cabinets in Wing No. 6, Tempo Bldg., D, to start the new file. Investigations Division estimates that this move will provide sufficient cabinets to hold all new cases (50,000) for the next six months.
- (5) Within this period of time the Bureau of Departmental Operations and Office Services Division will jointly review the space situation in the Pension Building looking toward moving the Security Research Section from Tempo Bldg., D to Pension Building and making Wing 4 in Tempo D available for expansion of the new file.
- (6) If this space (Wing 4) does not become available Office Services Division will consider feasibility of gradually separating the remaining 259 empty cabinets in Wings 1, 2, and 3 for the new file and rearranging the 2610 full cabinets into these wings.
- (7) Since the new numerical method of filing is most efficient and economical when used with open-shelf filing equipment we will, as resources permit, commence buying open-shelf equipment as required by growth of the new file for a period of six years. This is the maximum time the files will be retained hereafter.
- (8) After 5 years the old file will be transferred to GSA Federal Records Center with a retention schedule of 30 years from breaking point.
- (9) After six years, the oldest year of the new file will be transferred to GSA Federal Records Center and each year thereafter so that the new file will contain not less than 5, nor more than 6 years of the latest cases.
- (10) Reopened cases will be up-dated, assigned new file numbers and filed in current file when it is necessary to recall such cases from Federal Records Center.

The first four items have been implemented, the others, of course, will require additional time.

You will note from items 8 and 9 that we now have a definite retention schedule which provides procedures for the orderly disposition of this file.

DISPOSITION OF CONFIDENTIAL FILE—SUMMARY OF THREE PROPOSED PLANS FOR
DISCUSSION

Plan A

Based on undated memorandum Mr. Crowe to Mr. Johnson

1. Break the present file immediately (6/30/59) and establish 30-year disposal schedule.
2. Separate and rearrange the present empty 344 file cabinets which are now interspersed throughout the file into a separate area.
3. Start new file on numerical basis in the 344 empty cabinets, using envelopes as set forth in memorandum.

Mr. Crowe's memorandum estimates that 85 empty cabinets now in Wing 6 would be sufficient to handle all new investigative files received (50,000) for six months. On this basis the 344 empty cabinets should be sufficient to handle all new investigative files received for 2 years, if the proposal does not contemplate up-dating related and other cases from the old to the new numerical file. If reopened and related cases are up-dated and brought forward to the new file the 344 empty cabinets would be filled in 1 to 1½ years.

Advantages of this plan are that;

1. It would give Investigations Division an opportunity to test the adaptability of the recommended numerical filing system and other changes connected with establishing a new file.
2. Additional out-of-pocket expense would be negligible consisting primarily of purchase of new guides to the numerical file.
3. Establish a definite (30-year) disposal schedule for a file now rated permanent retention.

Disadvantage

1. Need for office space by GSA which wishes to acquire 2 to 3 wings for this use. GSA has current need for 1,600,000 square feet of office space and only 200,000 square feet available.
2. No room for expansion of new file after 1 or 2 years (assuming GSA allows continued use of space in Bldg. D for files).

Plan B

Based on joint study made by representatives of GSA and COID

1. Break present file immediately (6/30/59), and establish 30-year disposal schedule.
2. Move entire file to Federal Records Center, Alexandria, Va., provided:
 - (a) GSA provide appropriate space with adequate physical and operational security. This latter can be provided by CSC assigning employees of COID to service the file.
 - (b) GSA provide adequate delivery service. They have agreed to furnish three deliveries a day. GSA is anxious to take over space which would be made available in Bldg., D by this move to use as office space, which costs \$4.00 to \$6.00 a square foot in Washington, D. C.
3. Start new file on numerical basis:
 - (a) using 344 empty file cabinets and using envelopes as set forth in Plan A, or
 - (b) using file folders and open-shelf filing.

Advantages

1. Provide better physical security for the Confidential File and permit equal or better operational security.
2. Under 3a there would be the same advantages as given in Plan A plus conversion for Governmental use of 2 to 3 wings in Bldg., D from file occupancy to office space.
3. Room for expansion of new file.

Disadvantages

1. Some slight delay, probably immaterial, in accessibility of files by COID or agency investigators.
2. Under 3b more expensive operation as set forth in joint study report.

Plan C

Based on availability of space in Main Building

1. Break the present file immediately (6/30/59) and establish 30-year disposal schedule.
2. Move entire file to two balconies on G Street side of Main Building, provided that space is renovated, and adequate lighting, ventilation and physical security is installed by GSA.
3. Same as 3 in Plan B

Advantages

Same as Plan B

Disadvantages

Same as Plan B

Exhibit A5

BUREAU OF MANAGEMENT SERVICES

OFFICE OF DIRECTOR

Memorandum of discussion and agreements regarding disposition of Confidential File, Investigations Division, Bureau of Departmental Operations.

-- o --

A meeting was held at 2:30 PM Friday, May 27, 1959 with David F. Lawton, Assistant Director, Bureau of Departmental Operations, in his office and was attended by:

David F. Williams, Director, Bu. of Management Services
Kimbell Johnson, Chief, Investigations Division
Hugh P. Crowe, Chief, Administrative Section, COLD
W. Earl Byram, Chief, Office Services Division
Carlton Gloyd, Chief, Records Admin. Sect., OSD
Walter T. Pumphrey, Management Analyst

Three plans as set forth in the attachment "Disposition of Confidential File" were discussed. All of these plans contemplate breaking (i.e. ceasing to file new cases in) the present alphabetical Confidential File as of June 30, 1959; starting a new file, as of July 1, 1959, on a numerical chronological basis to permit of orderly disposition; and establishing a 30-year retention schedule for the file.

The advantages and disadvantages of each of the plans was discussed at some length and the following agreements reached:

1. Break the present file as of June 30, 1959.
2. Start a new file as of July 1, 1959 on a numerical chronological basis, number of case to be shown on Security Index card.
3. Use file folders instead of envelopes for the new file. (Chief, Office Services Division will procure appropriate folders for this purpose).
4. Office Services Division to separate the 85 empty file cabinets in Wing No. 6, Tempo Bldg., D, to start the new file. Investigations Division estimates that this move will provide sufficient cabinets to hold all new cases (50,000) for the next six months.
5. Within this period of time the Bureau of Departmental Operations and Office Services Division will jointly review the space situation in the Pension Building looking toward moving the Security Research Section from Tempo Bldg., D to Pension Building and making Wing 4 in Tempo D available for expansion of the new file.

6. If this space (Wing 4) does not become available Office Services Division will consider feasibility of gradually separating the remaining 259 empty cabinets in Wings 1, 2, and 3 for the new file and rearranging the 2610 full cabinets into these wings.
7. Since the new numerical method of filing is most efficient and economical when used with open-shelf filing equipment we will, as resources permit, commence buying open-shelf equipment as required by growth of the new file for a period of six years. This is the maximum time the files will be retained hereafter.
8. After 5 years the old file will be transferred to GSA Federal Records Center with a retention schedule of 30 years from breaking point.
9. After six years, the oldest year of the new file will be transferred to GSA Federal Records Center and each year thereafter so that the new file will contain not less than 5, nor more than 6 years of the latest cases.
10. Reopened cases will be up-dated, assigned new file numbers and filed in current file when it is necessary to recall such cases from Federal Records Center.

Exhibit A6

STANDARD FORM NO. 64

Mr. Gloyd
For approval
Adler
Mr

Office Memorandum • UNITED STATES GOVERNMENT

TO : Mr. William B. Symes *WBS*DATE: July 15, 1959
MA:WTP:mecFROM : David F. Williams *DFW*SUBJECT: RETENTION SCHEDULE — CONFIDENTIAL FILES *A6*

On July 7, I sent a memorandum to Mr. Irons outlining the agreements reached in our May 27 meeting with Dave Lawton regarding the disposition of the Confidential File. This memorandum was returned with Mr. Irons' notation of agreement, as shown on attached copy.

Please have Mr. Gloyd take the necessary steps to secure approval of a 30-year retention schedule for Confidential Files and for the two smaller files covered in our study.

Attachment

o.c.: Carlton Gloyd *Matidum 7/15/59*

Exhibit A7

STANDARD FORM NO. 64

Office Memorandum • UNITED STATES GOVERNMENT

TO : Mr. David F. Williams

THRU : Mr. Kimbell Johnson

FROM : W. E. Byam

DATE: AUG 28 1959

MOR:SQL:wg

SUBJECT: DISPOSITION OF RECORDS

Problem:

To obtain authority to dispose of Investigation Files, 1903-28, and Loyalty Investigation Files, 1916-20, after materials of administrative value are separated and retained.

Discussion:

The two file series mentioned above are described on the attached SF 115.

Investigations Division with assistance of others including Mr. Alldredge of National Archives made a study of their confidential files. The study recommends the following disposal action:

"That the investigative file, 1903-1928, and the loyalty investigations file, 1916-1920, be purged of any materials still having administrative usefulness and the remainder be submitted to the National Archives on a disposal list, which when approved by the Congress will be destroyed except for every fiftieth case."

Employees of National Archives worked on this recommendation. They requested every fiftieth case in each file series as an archival sampling to illustrate how the Federal Government handled certain transactions.

Investigations Division has purged the Loyalty Investigations File, 1916-1920 and has placed materials of administrative usefulness into the Confidential File. They intend to do the same with similar materials in the Investigative File, 1903-1928.

We agree to the disposal of these file series once materials of administrative value are purged and placed in the Confidential File. These materials, of course, include any appeal cases where the Commission has taken action. We do not agree to an archival sampling because making certain cases accessible to the serious student is in all probability an intrusion of individual rights. As many relatives of these investigated are still living, this could incur embarrassment to the Commission and to the Federal Government.

Action Recommended:

Approve disposal of Investigation Files, 1903-28, and Loyalty Investigation Files, 1916-20, after materials of administrative value are separated and retained.

If this recommendation is approved, please sign the attached SF 115 and return it to the Records Administration Section for submission to the National Archives and Congress.

Form No. 118
Revised November 1961
1st. Div. of General Services
Administration
GSA Gen. Reg. 41-118

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION,
FROM: NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON 25, D. C.

1. FROM AGENCY OR ESTABLISHMENT
U. S. Civil Service Commission

2. MAJOR SUBDIVISION
Central Office

3. MINOR SUBDIVISION
Investigations Division

4. NAME OF PERSON WITH WHOM TO CONFER
Carlton A. Oloyd

5. TEL. EXT.
5036

6. CERTIFICATE OF AGENCY REPRESENTATIVE

I hereby certify that I am authorized to act for the head of this agency in matters pertaining to the disposal of records, and that the records described in this letter
consist of 1 page are proposed for disposal for the reason indicated: ("X" only one)

☐ A The records have
ceased to have suffi-
cient value to warrant
further retention.

☒ B The records will cease to have sufficient value
to warrant further retention on the expiration
of the period of time indicated or on the occur-
rence of the event indicated.

4/19/59

D. F. Williams

(Signature of Agency Representative)

Director, Bureau of
Management Services

(Title)

7. ITEM NO.	8. DESCRIPTION OF ITEM (WITH INCLUSIVE DATES OR RETENTION PERIODS)	9. ACTION TAKEN
1	Central Office Investigation Case Files: Reports on appli- cants and Federal personnel investigated by the Commission in administering the merit system and in carrying out its responsibilities under certain statutes such as the Veter- ans' Preference Act of 1944 and under the security clear- ance program. The case files include the following: some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suita- bility and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive, qualification cases, and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except NACI's for nonsensitive positions where no derogatory information is found, which are disposed after 3 months). Cases contain papers giving the story of each investigation from original request or appeal to final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Appeals and Review, the Loyalty Review Board, and the Commission, are included.	DISPOSAL APPROVED
	Destroy 30 years from date of last action. Transfer to Federal Records Center 5 years after date of last action. Destroy 25 years later	
	NOTE: Due to the confidential nature of these papers, samples are not submitted but are available for inspection in Room 354, Civil Service Commission, 8th and F Streets, N. W.	

Four copies, including original, to be submitted to the National Archives and Records Service

16-50420-2 GPO

APPRAISAL REPORT

Disposal Job No. II-NNA-3152

Approved:

Item 1, because these records have no appreciable value for historical or other research uses, and the Civil Service Commission has determined that neither it nor other agencies need them for administrative purposes for more than 30 years after the date of last action in a case. These investigation case files contain an overwhelming amount of minutiae on the fitness of about 2,000,000 persons for Federal employment.

There would be little possible research use to which they might be put which could not be met by other records which are being preserved. Official personnel folders, which have a long retention period, document the acceptance of an individual for Federal employment after investigation. The Federal Bureau of Investigation presently is retaining a copy of its report when it makes a full field investigation for the Commission in one of these cases.

Any policy matter relating to the Commission's investigation program that might be reflected in some of these case papers would be documented in correspondence files of the head of the Investigations Division or of the Civil Service Commission. The Commission also is retaining a master card index to its security investigations. This index covers all individuals, about 6,000,000 of them, investigated by the Civil Service Commission and other agencies since 1939, and some prior to 1939. The index serves also as a record, since each card contains for the individual named the date of the case, results of national agency checks, other data on the case, and such identifying information as social security number and date and place of birth. The Commission also is preserving narrative and statistical reports on its investigation program.

These other records of the Civil Service Commission that are being preserved contain sufficient information on the Commission's activities and functions in investigations concerning merit, suitability, and loyalty. The case files for which disposal authority is requested, therefore, need not be preserved permanently in order to document these activities and functions.

Appraised by:

Hardee Allen

Dec. 15 1959

CH

Approved for the Archivist:

Thad E. Page
Chief Archivist
General Records Division

12/17/59

Exhibit A8

Office Memorandum • UNITED STATES GOVERNMENT

TO : THE COMMISSION

DATE: SEP 12 1959

THRU : Mr. Evans

HQR:SGI:CAG:wg

FROM : David F. Miller

Attachment #1

SUBJECT: CCC RECORDS CONTROL -- HANDBOOK S-814

Purpose:

To establish a records control schedule providing for the disposition of CCCD Investigative Case Files dating from 1928.

Discussion:

The case files include the following: Some 18 or more types of merit system cases involving violations of Civil Service laws or rules and regulations and suitability and fitness of applicants, eligibles, and appointees; cases brought under the Veterans' Preference Act of 1944; competitive qualification cases; and loyalty and suitability cases investigated for other agencies under the national security program instituted in 1947 and expanded in 1952 and 1954 (except MACI's for non-sensitive positions where no derogatory information is found, which are disposed of after 3 months). The cases, which are arranged alphabetically by name of individual, contain papers giving the story of each investigation from the original request to the final determination by the Commission or record of discontinuance of the case. Cases appealed to regional offices or the Central Office, the Board of Appeals and Review, and the Loyalty Review Board, are included.

The attached report on a study of the Confidential Files made by the Administrative Section of the Investigations Division contains recommendations for the disposal of this file. Based on this study and further discussions with representatives of Bureau of Departmental Operations and Bureau of Management Services on May 27, 1959, agreement was reached on the following points:

1. Breaking (cease filing in) the present file on June 30, 1959 and starting a new file on July 1, 1959.
2. Transferring the old file to the Federal Records Center 5 years after June 30, 1959 and destroying it 25 years later.
3. Updating reopened cases and placing them in the new file.
4. Breaking the new file annually.
5. Retaining closed cases in the new file for 5 years and
6. Transferring closed cases from the new file over 5 years old to the Federal Records Center and destroying them 25 years later.

Mr. Everett Allredge, Director, Program Development Division of the National Archives and Records Service participated in the study of the Confidential Files Unit made by the Administrative Section of the Investigations Division and recommended:

1. That an archival series consisting of all cases appealed to the highest board of review of the Civil Service Commission from 1928 thru 1950, be transferred to the National Archives. These cases should be subject to strong restrictions on access and would be open to the serious scholar for the purpose of illustrating how the Federal Government handled certain transactions.
2. That cases appealed to the USGSC Loyalty Review Board and its predecessors or successors, be kept permanently.

The file presently contains approximately 2,000,000 Investigative Case Files and since they are arranged alphabetically, the cost for purging appeal cases including those appealed to the Loyalty Review Board, its predecessors or successors, would be prohibitive. Opening these appeal cases even to the serious scholar may be considered an intrusion of the individual rights of those investigated and could result in embarrassment to the Commission and Federal Government. Many of these cases were acted on by the full Commission. Papers in these cases show the basis for and who made the decisions.

Justification for Disposal:

1. Each case file will have been available long enough to serve all possible investigative needs of the Commission or those of other agencies. Cases dated prior to 1939 are rarely used and a lack of use of two older collections of investigative case files dated prior to 1928, which will also be destroyed, is an indication that these records lose their administrative value after a lapse of 30 years.
2. The result of each investigation is passed on to the agency concerned or other parts of the Commission. During the processing of each investigation, the case is indexed. This index will be retained permanently. Cases relating to Federal employees are also recorded in the Official Personnel Folder.
3. Narrative and statistical reports as well as other records of the Commission contain sufficient information of the Commission's activities and functions in merit, suitability and loyalty investigations. This collection of case files therefore is not necessary to document those activities and functions.
4. These papers should not be made available to the public as archives. Even after a long period of time they could damage or harass individuals and their families. The records contain allegations, proven and unproven, concerning an individual's use of alcohol, indebtedness, emotional stability, veracity, morality, questionable associates, criminal actions, and police records. Such

Information is furnished to the Commission in confidence. Therefore, it does not seem that it should be made available in the future any more than it is at the present.

Action Recommended:

1. Disapprove the transfer of an archival sampling of appeal cases to the National Archives.
2. Approve the following disposal schedule:

<u>Title</u>	<u>Class</u>	<u>Authorized Disposition</u>
COIL Investigative Case Files	Temporary	Transfer to Federal Records Center 5 years after last action. Destroy 25 years later.

Action:

Concurred
9/15/59
Warren B. Irons

Action:

Agree to discussion
Recommendation 9/12/59
Lawton 10/7/59
Commissioner Lawton

Action:

Recommended Action Approved
Barbara Gundersen
Commissioner Gundersen
9-11-59

Recommendation Action: I think we should discuss in Commission
approved
McGuire 11/12/59
Chairman Jones 9/26/59

EXHIBIT A-9

JANUARY 29, 1960.

To: MR. KIMBALL JOHNSON.

From: W. E. BYRAM.

Subject: Disposal schedule for COID investigative case files.

The National Archives and Records Service has approved our request for authority to dispose of COID case files. A copy of the approved SF 115 is attached for your information.

This schedule will be included in the next revision of the CSC Records Control Schedule, Handbook S-814.

Authority contained in this schedule also covers the two old series of Investigative Case Files dating 1903-1928 and 1916-1920.

Exhibit A10

UNITED STATES GOVERNMENT

U.S. CIVIL SERVICE COMMISSION

Memorandum

Subject: COID INVESTIGATIVE CASE FILES

DATE: OCT 3 1960

From: David F. Williams, Director
Bureau of Management ServicesIn Reply
Refer To: MOR:CAQ:wgTHRU: Warren B. Irons
Executive Director

To: THE COMMISSION

The impending move of the Investigations Division makes it necessary to find space for the storage of approximately 22,000 cubic feet of COID Investigative Case Files currently occupying three wings in Tempo Building D. The following proposals have been considered:

1. Moving the records to the G Street Balcony in the Main Building: This will entail an expenditure of an estimated \$45,000 for renovating and securing this area and require us to station employees in this undesirable area for servicing the files.
2. Transferring the records to the Federal Records Center in Alexandria: This will eliminate the need for moving this tremendous volume of records again when we are ready to occupy our new building, the expenditure of funds for renovating the G Street Balcony, and the cost for maintenance and servicing, which will be borne by the Federal Records Center.

On November 12, 1959, the Commission approved the recommendation to start a new series of COID Investigative Case Files on July 1, 1959 and transfer the old files to the Federal Records Center 5 years after June 30, 1959.

In view of the above, authorization is requested for the immediate transfer of these records to the Federal Records Center. If this authorization is granted, details for safeguarding and servicing will be worked out with the Bureau of Departmental Operations and the National Archives and Records Service. From preliminary discussions with representatives of the National Archives and Records Service, we are certain that satisfactory arrangements can be worked out for the protection and servicing of these records. The Federal Bureau of Investigation has concurred in our proposal to move cases containing copies of FBI reports to the Federal Records Center.

Action Recommended:

The immediate transfer of COID Investigative Case Files dating prior to June 30, 1959, to the Federal Records Center in Alexandria, Virginia.

Action:

Warren B. Irons
Warren B. Irons

Action:

Approved 10/4/60
J. D. Lawton
Commissioner Lawton

Action:

Approved
Barbara Gunderson
Commissioner Gunderson
 10-7-60

Action:

Approved
Rufus
Chairman Jones
 10/17/60

EXHIBIT A-11

OCTOBER 18, 1960.

MEMORANDUM OF AGREEMENT COVERING THE TRANSFER AND SERVICING OF A PORTION
OF THE COMMISSION'S CONFIDENTIAL INVESTIGATIVE FILES BY THE GSA FEDERAL
RECORD CENTER, ALEXANDRIA, VA.

DAVID F. WILLIAMS,
Director, Bureau of Management Services, U.S. Civil Service Commission.

EDWARD O. CAMPBELL,
*Regional Director, Region 3, National Archives and Record Service General Services
Administration.*

This agreement between the Civil Service Commission and the National Archives and Record Service of the General Services Administration covers arrangements for the transfer, security, servicing, and control of a portion of the Commission's confidential investigative files.

(1) Transfer of the file

GSA will make the necessary arrangements for the transfer of the cabinets containing the alphabetically arranged confidential file from Temporary "D" Building to the fourth floor of Building No. 1, Federal Record Center, Alexandria, Va. GSA will supervise the move and assume responsibility for any and all expenses incurred.

(2) Security clearance requirements

Access to the fourth floor of Building No. 1 will be severely restricted subject to the following investigative requirements:

a. For Supervisors and Archives Assistants.—All present and future Record Center supervisors and employees, who are, or will be, actively engaged in servicing (searching and filing) the Commission's files must have received a full field investigation, and have been cleared for access to classified defense information up to and including "SECRET." The investigative files on present and future employees will be reviewed by the Chief, Security Operating Section. Access to these files will be limited to those individuals who require access as a part of their official duties.

b. For Laborers and Char Force Personnel.—The minimum investigative requirements for laborers and char force personnel, who have access to fourth floor of Building No. 1, will be a national agency check and written inquiries. The results of these checks on present and future employees will be reviewed by the Chief, Security Operating Section. Laborers and char forces personnel will be permitted access to the fourth floor restricted area during regular working hours only. While in the area, they will be under the constant surveillance of a supervisor or other employee who has been properly cleared by a full field investigation, according to provisions in Item 2-a above.

c. For All Others.—Under no circumstances will other employees of the Record Center who have not been properly cleared by terms of this agreement, employees of other Federal agencies, or visitors to the Record Center be permitted access to the Commission's confidential investigative files.

(3) Inspection privilege

GSA agrees to extend to authorized representatives of the Commission the privilege to inspect the fourth floor area of Building No. 1 at any time.

(4) Operating procedures

a. Requests for Files.—The Commission will prepare GSA Optional Form 11 (Reference Request—Federal Record Centers) for each file requested. The form will show the name and date of birth of the subject file. Immediately below the identifying data will appear a code symbol, which will assist the Commission in routing the file. The first part of the code symbol will be either number 1 or 2, which will identify the Commission office that completed the request form; the second part will identify the office that requested the file; the third part will identify the name of the requestor. Examples of the code symbol are: 1-SRS-Doc; 2-DXE-Roe.

Archives assistants who prepare the files for delivery will be concerned with the number appearing at the beginning of the symbol. All files pulled where the symbol on the request form is prefixed by the numeral 1, will be placed in the container with number "1" marked on the lid. Those files where the symbol on the request form is prefixed by the numeral 2, will be placed in the container marked "2".

The Commission will complete Optical Form 11 by showing the date of the request, the initials of the person who received the request, and by inserting "CSC" in

the block space at the lower left hand corner. GSA will supply the Commission with all Optional Forms 11 required.

b. *Distribution of Copies of Optional Form 11.*—Optional Form 11 is a three-part snapout. The Commission will retain the first part of this form for its central copy. The second part is the receipt copy which will be initialed and dated by the Commission employee who receive the file. This copy will be returned to the Record Center, along with the new requests, on the next delivery. The third part of the form is the charge-out card which will be inserted in the confidential investigative file as a permanent record of the charge out.

The Commission agrees to keep an accurate record of the number of requests for files submitted, and to report the total to the Record Center on the twenty-sixth calendar day of each month.

c. *Servicing the File.*—Copies of the Commission's DI Form 19 (Confidential Files Unit Charge Card) will remain in the file as a permanent record of previous charge outs. Future charge outs will be identified by Optional Form 11, and will also remain in the file as permanent records.

GSA will file returned agency reports, will refile cases received from the Commission, and will drop file miscellaneous papers in the appropriate file envelope. Of course, the major portion of the files requested will not be returned.

(5) Delivery service

a. *Regular Delivery.*—GSA will make two regular deliveries each workday to the Commission's Main Building at 9th and F Streets, N.W.

The deliveries will be made to the incoming mail room (Room 69) at approximately 10:00 A.M. and 2:00 P.M.

Confidential investigative files and other materials in transit either to or from the Main Building will be placed in locked metal bins which will be supplied by the Commission. The GSA driver will pick up exchange bins containing material for the Record Center on every delivery.

b. *Special Delivery.*—One-hour special delivery service will be provided on any case file where urgency is specified. GSA agrees to accept telephone requests for urgent service. The Commission will confirm urgent service requests by furnishing the initialed receipt copy of Optional Form 11 to the GSA messenger at the time of delivery. It is understood that requests for urgent service will be held to a minimum.

(6) Interim physical security

a. *Security Procedure During Transfer of Files.*—The physical transfer of the file will commence on or about October 19, 1960. GSA movers will work an eight-hour day shift from this day forward until the transfer has been completed. Trucks with closed trailers will be used for this move. This rules out the use of open or tarpaulin covered trailers. A Commission employee will seal each trailer before it leaves the loading dock at Temporary D building. Another Commission employee will open the trailer upon its arrival at the Record Center and inspect the file cabinets before unloading is permitted.

b. *Special guard service.*—We understand that several days will elapse before all the case files are boxed and placed in the fourth floor security area of Building No. 1. We further understand that until this action has been completed, the cabinets will be on the first and third floors, which are not security areas. For this reason, GSA will arrange to have a special guard in Building No. 1 at all times when the cabinets are on the first and third floors except during the time when the files are under the observation and control of GSA personnel who are cleared to service the files.

(7) Procedure regarding submission of CSC form 328 (information regarding close relatives)

CSC Form 328 (See copy attached) will be filled out by all present and future GSA supervisors and archives assistants who actually service the file, and by laborers and char force personnel who have access to the restricted fourth floor area, prior to their having access to the Commission's confidential investigative film. This form requires the employee, or prospective employee, to list all their close relatives, and will be submitted to the Chief, Security Operating Section. The purpose behind the execution of this form is to prevent persons who service the file from having access to information regarding members of their immediate family and other close relatives. The Commission reserves the right to remove and retain any case files found in the confidential file on persons listed on the CSC Forms 328 submitted by the Record Center.

Please let us know if the terms of this agreement are satisfactory to GSA.

Exhibit A12

GENERAL SERVICES ADMINISTRATION



Region 3
Washington 25, D. C.

October 18, 1960

IN REPLY REFER TO:

3N

David F. Williams, ~~Director~~
Bureau of Management Services
U. S. Civil Service Commission
Washington, 25 D. C.

Dear Mr. Williams:

The Memorandum of Agreement covering the transfer and servicing of a portion of the Civil Service Commission's confidential investigative files by the Federal Records Center, Alexandria, Virginia, as set forth in your memorandum (DI:WRS:lr) to me of this date, is satisfactory to the General Services Administration. I believe that it covers the points agreed to in our meeting of October 13 and that it will provide a sound and workable basis for administering the files.

Sincerely yours

A handwritten signature in dark ink, appearing to read "E. G. Campbell".

E. G. Campbell
Regional Director
National Archives
and Records Service

Exhibit A13

MOL NO. 60 - 7 (1)

UNITED STATES CIVIL SERVICE COMMISSION

WASHINGTON 25, D. C.

January 12, 1960
DIA:WRS:jng

FIELD OPERATIONS LETTER NO. 60 - 7

TO: REGIONAL DIRECTORS

SUBJECT: INFORMATIONAL LETTER REGARDING THE NEW RECORDS-MANAGEMENT PROGRAM
FOR THE COMMISSION'S INVESTIGATIVE FILE

The purpose of this letter is to provide information concerning the new filing system adopted for the Commission's investigative files. Studies leading to the development of this system were initiated because the existing alphabetical file needed expanding and there was no space available for this purpose. Also, it had long been recognized that a disposal schedule for these files was needed as their investigative value decreases with the passage of time. The problem, therefore, was how eventually to dispose of the nearly two million alphabetical files at the lowest possible cost.

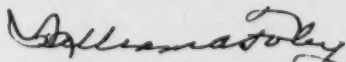
To help solve the expansion and retention problems, the Commission obtained the assistance of records-management specialists with The National Archives. After exploring the adaptability of several established systems of file maintenance and disposal, the plan described herein was adopted. This plan not only will solve future files storage problems, but also will permit eventual block disposal of the Commission's investigative files without requiring a costly review of each file. The Government's top consultants on records-management consider this plan to be the most practical and economical files system available for our particular type of service and filing needs. A brief description of this system follows:

1. The old alphabetical file was "broken" as of 6-30-59. This means that no new investigative files will be added to this file; consequently, no additional space will be needed for expansion of the file.
2. A new numerical file was started on 7-1-59. Open-shelf filing equipment has been ordered to house this file which will reduce by nearly forty per cent the amount of space required.
3. A file folder for investigative files was designed to replace the file envelope used previously. A file number is assigned each file folder in COLD. This number is also stamped on the closing index card submitted with the file folder for the Security Investigations Index. Therefore, the Security Investigations Index serves as the locator file to the numerically filed folders.

New file assembly instructions were issued aimed at eliminating all duplicate and extraneous papers of no investigative value from our files (see Commission Letter No. 55-18, Supplements-No. 26 and 31, Revised Instructions on Preparing and Assembling The Investigative File For COLD, Handbook IN-202). These instructions apply to regional offices and the Investigations Division in the central office. COLD has the responsibility for the reassembly of all files returned by other offices in the central office.

4. Previous alphabetical files which are requested for current use are reassembled as discussed above and upon their return for filing are transferred forward to the numerical file. The initial cost of reassembling these cases will be offset in the long run by the added convenience and economy of reviewing files which have been stripped of duplicate and unnecessary papers and arranged in proper order. There will be a marked decline in the number of alphabetical files received for reassembly after five years as most of the required transfers will have been made by then. This reduced activity will also permit the transfer of the alphabetical file to cheaper storage space in a Federal Records Center at that time.
5. The program calls for keeping under immediate Commission control between five and ten years of active numerical files. A planned system has also been provided for retiring blocks of these file folders to cheaper storage space as this file continues to grow. As a result of these changes, the new numerical file will occupy less than one-third of the space presently occupied by the alphabetical file.
6. A thirty-year disposal schedule for our investigative files is now pending approval by The National Archives and The Congress. If this schedule is approved we will be able to dispose of the entire alphabetical file after thirty years. It will not be necessary to review any of these files as all cases that were reopened during the thirty-year period will have been brought forward to the new file. The same thirty-year schedule would apply to all new investigative files that remain inactive in the future.

Indicative of the interest shown in the new file system, we have already received requests from two major agencies for information concerning its design and operation.


William A. Foley, Director
Bureau of Field Operations

Distribution: 15

UNITED STATES CIVIL SERVICE COMMISSION
BUREAU OF DEPARTMENTAL OPERATIONS
WASHINGTON 25, D. C.

August 12, 1960

TO: ALL EMPLOYEES, INVESTIGATIONS DIVISION

FROM: Kimbell Johnson *Kimbell Johnson*

SUBJECT: REVIEW OF IMPORTANT ACCOMPLISHMENTS DURING FISCAL YEAR 1960

Important events sometimes slip by unnoticed when we are so busy with the many detailed tasks that demand our daily attention. For that reason, it is good to pause once in a while to take a closer look at what has been accomplished. The end of the fiscal year is a good time to do this. Several significant developments stand out as we look back over the fiscal year ending June 30. I am pleased to take this means of reviewing them with you, with the thought that they may be both interesting and inspirational to you.

.oOo

The Investigations Division ended the year with almost a clean slate as far as old work was concerned. We began the year with substantial backlogs in many of our operations. Through the commendable efforts of all our employees during the year, only normal amounts of work were pending in all activities except Limited Suitability Investigated Cases in which we reduced the backlog from 14 to 12 weeks and All Other Merit System Cases in which we reduced the backlog from 28 to 12 weeks. (Normal for each of these is eight weeks.)

Our records covering regular program work -- that is, all but the reimbursable full field investigations program -- show that during the year you did your work in less time while maintaining quality and accuracy as high as ever. As a result, our operating costs were greatly reduced. To illustrate, if this year's work were done in the time it would have required last year, the cost this year would have been \$62,682 higher. Thus your efforts not only helped to bring our regular program work up to date but permitted us to make available to other Commission offices funds originally allotted to us which we did not urgently need.

Unfortunately, factors beyond our control caused an increase in full field investigation costs. Even so, the savings for all the Division's work totalled \$11,106, providing ample testimony to your excellent performance during the year.

.oOo

The past year marked a major change in our investigative files system. Previously the case files kept in the Confidential Files Unit were classed

as "permanent" records. There was no established way to dispose of files having no further value. The only way we could eliminate old files of no current value was by a costly review of each case file. We had neither the time nor the personnel to do much of this. As a consequence our files were growing rapidly and were requiring more and more space with each passing year.

This undesirable situation was changed by adoption of the new filing system for the investigative files which went into effect on July 1, 1959. The new file uses folders instead of envelopes, open shelf equipment instead of file cabinets, and is arranged numerically rather than alphabetically. No new material is being added to the old alphabetical file, so that eventually the files remaining in it will be inactive and may be stored in less costly space and later destroyed. Likewise, the numerical arrangement of the new file will permit us to store or dispose of these files on the basis of their age when they are no longer needed.

Related to the change in the filing system, we attacked the problem of the rapid growth of our investigative files by cutting down on the amount of material going into them. We did this by eliminating the need for some files in individual cases. Where files had to be kept, we issued instructions to destroy unnecessary copies and miscellaneous papers having no continuing value.

oOo

In January of this year the Commission, after extensive negotiation with the interested Departments and agencies, adopted a change in the scope of its full field investigations as a means of reducing the increasing costs which continued to spiral upward with each passing year. Until that time each full field investigation went back to January 1937 or to the person's 18th birthday, whichever was later. This fixed starting point meant that each year there was an increase in the length of the period to be covered by investigation. As time passed, investigation was required at more and more places. The added travel cost and investigating time caused our costs to move steadily upward.

This problem was a major concern to all the Government agencies for which the Commission conducts investigations on a reimbursable basis. Equally interested was the Department of Defense, which makes over 100,000 investigations each year of military, civilian, and industrial security personnel. To solve the problem, representatives of the Commission met with representatives of the Atomic Energy Commission and the Defense Department to work out an understanding of what constitutes adequate coverage in a full field investigation. All three agencies agreed that intensive coverage of the most recent 15 years in the average case would adequately meet their security needs. To this would be added a thorough personal investigation of any derogatory matters developed requiring investigation beyond the 15-year period.

As a result of this change in the investigative period, the Commission was able to reduce its costs by \$40 a case. Whereas in January the billing rate to agencies was \$370 for each full field investigation, by the end of June it had been reduced to \$330 a case. The change will save more than a million dollars each year for the investigations conducted by the Commission alone. Beyond this, the Defense Department has adopted the 15-year period for the large volume of investigations it conducts. As a result, we expect that the total savings to the Government, and to the taxpayer, will add up to three or four million dollars a year.

oOo

In April of this year the Commission adopted important changes in its suitability evaluation guides. These are the guides which must be applied in passing on the suitability of persons applying for or appointed to Government jobs.

In recent years much concern with regard to suitability decisions has been expressed by members of the Commission, the general public, the Congress and the Courts. One big reason for this interest is that these decisions have such a vital impact on the lives of the individuals concerned. Not only is possible separation from Federal employment at stake, but future ability to earn a living as well. Thus, it is important that suitability findings be completely fair and impartial. Employees should be removed not on technicalities but on facts which in themselves are serious enough to support the action taken. Maximum opportunity to explain derogatory information must be provided, subject only to the need for protecting confidential sources of information.

The most significant change in the guides deals with falsification of a material fact. The new definition of material fact is "one of such serious nature that generally in itself it clearly justifies denial of employment to an applicant or removal of an appointee." This means that the person's conduct and behavior must of themselves be disqualifying. Less emphasis is now placed on whether the person tried to conceal or misrepresent something. What he tried to hide is far more important.

Other key changes resulting from the new guides are these:

- More investigation is required in some cases, to develop full information as to the significance and importance of derogatory matters involved.
- Releases from persons under investigation must be requested when statements made by a former employer and employee do not agree with regard to discharge from private employment for material cause. This permits the employment to be identified to the employee when he is given the opportunity to explain his discharge.

- If removal is contemplated, a 3-member panel at GS-13 or above must review cases involving morals or disputed claims about discharge from private employment. The panels are composed of persons of known maturity and good judgment. Use of these panels assures that decisions will not be based on the convictions or moral standards of one individual.

These changes in the suitability ratings and guides are part of the Commission's continuing effort toward promoting the excellence of the Federal service and insuring public confidence in the Federal work force. They are in keeping with the Commission's tradition of treating individuals fairly and impartially and taking adverse action only on the basis of mature and responsible judgment.

oOo

Looking back at these developments all of us may rightly share a real feeling of accomplishment. Looking forward to the future, we may expect to face even greater challenges. One of these rests in the added responsibilities we have assumed with regard to the investigative program in the field, now that the Bureau of Field Operations has been abolished. I am fully confident, with the knowledge of our past record, that we will be equal to any demands made upon us.

Exhibit B1

UNITED STATES OF AMERICA
 GENERAL SERVICES ADMINISTRATION
National Archives and Records Service
 Washington, DC 20408



August 29, 1974

Mr. Robert J. Drummond, Jr.
 Director, Bureau of Personnel Investigation
 Room 913
 1717 H Street, NW
 Washington, DC

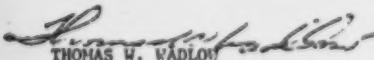
Dear Mr. Drummond:

We are considering a reduction in the retention period of closed "non-derogatory", or "favorable", personnel security clearance case files. Presently, non-derogatory and derogatory cases alike are held a full thirty years after date of the last action per item 23 of General Records Schedule 18 "Security and Protective Services Records" approved August 10, 1960. The Department of Defense, however, has since seen fit to reduce the retention period on their favorable cases to 15 years. An example of DOD reasoning in this matter is attached, as Enclosure 1.

In compliance with 101-11.404-2 of the Federal Property Management Regulations we must have the concurrence of a representative of the USCSC to amend this item, and have provided a place on the attached SF 115, "Request for Authority to Dispose of Records", for USCSC concurrence. In this regard we have consulted with Mr. Charles Cheseck, Chief, Records Administration Section, United States Civil Service Commission. He indicated his general agreement with the reduction in retention period, and recommended that we obtain your concurrence in the attached amendment to General Records Schedule 18. Please sign the original and two copies and return to us. If approved this amendment will result in disposal of an estimated 20,000 cubic feet of records at the Washington National Records Center.

If you have questions please contact Mr. Cheseck, who will receive a copy of this letter. If you approve this request, consideration should be given to filing security clearance case files in a manner which will facilitate separating derogatory from non-derogatory cases at time of transfer to the record center, as "unfavorable" or "derogatory" case files will continue to be retained 30 years.

Thank you.


 THOMAS W. WADLOW
 Acting Director
 Records Disposition Division

Enclosure

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS		LEAVE BLANK	
Revised November 1951 Prescribed by General Services Administration SA Reg. 2-17-124		DATE RECEIVED NOV 18 1954	
(See Instructions on Reverse)		DATE APPROVED 11/17/54 2/10	
U.S. GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON 25, D. C.		CONGRESSIONAL AUTHORIZATION HOUSE REPORT NO. 44	
FROM (AGENCY OR ESTABLISHMENT) Department of the Air Force, HQ USAF		DATE FEB 15 1955	
MAJOR SUBDIVISION Directorate of Administrative Services		NOTIFICATION TO AGENCY COMMENCE HAS AUTHORIZED DISPOSAL OF ITEMS MARKED "DISPOSAL APPROVED" IN COLUMN 12.	
MINOR SUBDIVISION Documentation Systems Division		DATE 2/17/55	
NAME OF PERSON WITH WHOM TO CONFER H. G. Geiger		DATE 2/17/55	
S. TEL. EXT. 11 59025		Signature of Representative William R. Boucher	
CERTIFICATE OF AGENCY REPRESENTATIVE Showing certify that I am authorized to act for the head of this agency in matters pertaining to the disposal of records, and that the records described in this list or			
Sublist of <u>1</u> page are proposed for disposal for the reason indicated: ("X" only one)			
☐ The records have ceased to have sufficient value to warrant further retention.		☒ The records will cease to have sufficient value to warrant further retention on the expiration of the period of time indicated or on the occurrence of the event specified.	
17 NOV 1954		WILLIAM R. BOUCHER Documentation Systems Division Directorate of Administrative Services	
(Initials)		(Time)	
7. ITEM NO.	8. DESCRIPTION OF ITEM (WITH INCLUSIVE DATES OR RETENTION PERIODS)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
	INVESTIGATIVE RECORDS (Applicable to OSI Activities) Closed Favorable Personnel Security Investigations (Background Investigations). These are reports of investigation reflecting the results of an inquiry into facts bearing on the loyalty and trustworthiness of an individual. These records are maintained as the basis of security clearances granted. 15 years from date of last investigative action.	GRS 18	Item 23
	Experience of the Directorate of Special Investigations (DSI), USAF, indicates that the 30-year disposal standard authorized by GRS 18 exceeds administrative requirements for retention of closed favorable background investigations. Background investigations in which unfavorable information is developed will continue to be retained indefinitely. Index cards on all subjects of background investigations will also be retained permanently. In addition to identifying information, those indices will indicate the type and scope of the investigation, date completed, and directive under which conducted.		

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)

General Services Administration

2. MAJOR SUBDIVISION

National Archives and Records Service

3. MINOR SUBDIVISION

Office of Federal Records Centers

4. NAME OF PERSON WITH WHOM TO CONFER

Thomas Wadlow

5. TEL. EXT.

13-35185

6. CERTIFICATE OF AGENCY REPRESENTATIVE:

LEAVE BLANK

DATE RECEIVED

JOB NO.

NOTIFICATION TO AGENCY

In accordance with the provisions of 44 U.S.C. 2303a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "with-drawn" in column 10.

(Date)

Archivist of the United States

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified.

Thomas Wadlow
Date _____ (Signature of Agency Representative) _____ (Title)

7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
	General Records Schedule 18 "Security and Protective Services Records"		
1.	Item 23 Personnel security clearance files of investigation of individuals employed by, or seeking employment with, the Federal government, or whose relationship with the government requires a security clearance, exclusive of copies of investigative reports or related papers furnished to agencies by the U.S. Civil Service Commission for which maintenance and disposition instructions are provided in Chapter I-2 of the Federal Personnel Manual: A. "Favorable" or "non-derogatory" case files, where no impediment to the granting of a security clearance is found: Dispose 15 years after date of last action. B. "Unfavorable" or "derogatory" case files: Dispose 30 years after the date of last action. Approved for the United States Civil Service Commission by: Date _____		

Exhibit B2

UNITED STATES GOVERNMENT

Attachment #3
U.S. CIVIL SERVICE COMMISSION

Memorandum

Subject: Proposed change in destruction schedule of
Investigative files

Date: 15 NOV 1974
In Reply Refer To:

From: Robert J. Drummond, Jr., Director
Bureau of Personnel Investigations

Your References:

To: Donald J. Biglin, Director
Bureau of Management Services

The attached correspondence is self explanatory. The cost of using the proposed 15/30 year destruction schedule would be prohibitive since each of the approximately 2.5 million alphabetical files stored at the Federal Record Center would have to be reviewed. The outside of the envelopes contain no markings to identify the age of the case nor whether it is derogatory.

As an alternative to the 15/30 year destruction schedule we propose lowering the schedule from 30 years for all files to 20 years for all files. This should eventually eliminate more files than the 15/30 year schedule and could be accomplished without reviewing the files for content. This would mean that all alphabetical files could be destroyed in mass in 1980. Since 1959 we have used a numerical filing system which lends itself to a simple destruction schedule. We estimate that approximately 75,000 files could be destroyed each year after 1980.

In 1959 Dave Williams negotiated our present storage and destruction agreement which required the approval of the Commissioners. It is presumed that changing to a 20 year destruction schedule would also require Commission approval. We find no reference to this in the delegation of authority manual.

If you agree with our proposals you should proceed with necessary negotiation with GSA, and, if appropriate, Commission approval.

1974 NOV 25

Keep Freedom in Your Future With U.S. Savings Bonds

CSC FORM 631
NOVEMBER 1961

Exhibit B3

Attachment #4

Sent

MOR:ADM 5-7

9 DEC 1974

Mr. Thomas W. Wadlow
Director, Records Disposition Division
National Archives and Records Service
General Services Administration
Washington, D.C. 20408

Dear Mr. Wadlow:

With reference to your letter of August 29, 1974, to Mr. Robert J. Drummond, Jr., Director, Bureau of Personnel Investigations, we have given careful consideration to your proposal to reduce the retention period for our investigative case files from 30 years to 15 years for "non-derogatory" and 30 years for "derogatory", however, as you know, our investigative case files do not carry any markings as to whether the case is or is not derogatory. To separate the case files stored at the Federal Records Center (FRC) into "non-derogatory" and "derogatory" categories would not be a simple task. Each case file would have to be reviewed to place it into the proper category requiring the expenditure of more resources than would likely justify the results gained.

Therefore, as an alternative to the 15/30 year destruction schedule, we propose reducing the retention schedule from the present 30 years for all investigative case files to 20 years for all files. This should eventually eliminate more files than the 15/30 year schedule and could be accomplished without reviewing the files. Our alphabetical files, which date from 1928-1959 and comprise approximately 19,000 cubic feet, could all be destroyed in 1980.

Since 1959 we have used a numerical filing system which lends itself more easily to a simple destruction schedule. Using the 20 year retention period, we estimate that approximately 75,000 files could be destroyed each year after 1980.

If you agree with this proposal, we will obtain the necessary Commission approval to reduce the retention period of the records in question from 30 years to 20 years. If approval is granted,

you may wish to screen our alphabetical files to purge those cases that are older than 20 years thus effecting a space reduction in the FRC before 1980.

Sincerely yours,

[Signature]
Donald J. Biglin, Director
Bureau of Management Services

MOR:CRChesek:cas 12/3/74

CRC 12/3/74

[Signature] 12-6-74

[Signature] 12/5/74
[Signature] 12/6/74

Exhibit B4

UNITED STATES GOVERNMENT

Memorandum

U.S. CIVIL SERVICE COMMISSION

Subject: Investigative Case Files, and Purge and Disposition of
Cards from Security Index

Date: JUN 19 1975

In Reply Refer To:

From: Donald J. Biglin, Director
Bureau of Management Services
Robert J. Drummond, Jr., Director
Bureau of Personnel Investigations
To: The Commission

Your Reference:

Thru: Bernard Rosen
Executive Director

On November 12, 1959, the Commission approved the recommendation to establish a 30 year retention period for Investigative case files, including case files of cases appealed to the U.S.C.S.C. Loyalty Review Board, and its predecessors or successors (Attachment 1). Approval of this recommendation was granted by the National Archives and Records Service (NARS) on November 27, 1959. Since obtaining approval we have been transferring these records to the Federal Records Center (FRC) five years after the date of the last action with destruction 25 years later. To date, none of these files have been destroyed.

By letter of August 29, 1974, NARS requested our approval to reduce the retention period for item 23 of General Records Schedule 18 "Security and Protective Service Records" from 30 years to 15 years for non-derogatory and 30 years for derogatory personnel security case files (Attachment 2). On November 15, 1971, the Bureau of Personnel Investigations recommended that as an alternative to the 15/30 year destruction schedule we propose lowering the schedule from 30 years for all files to 20 years for all files (Attachment 3).

We explored the 20 year schedule with NARS with the understanding that if they agreed, we would seek the necessary Commission approval to reduce the retention period of the files in question from 30 to 20 years (Attachment 4). They have agreed with our proposal, subject to Commission approval (Attachment 5).

Security Investigations Index

In conjunction with our investigative case files the Commission maintains a Security Index File comprised of record cards on investigations initiated by the Commission and other agencies. The index was first established under Executive Order 9835. Our current authority for maintaining the index is Executive Order 10450. Currently the file contains in excess of 12 million cards and dates from 1939 to present.

The cards in the index show when an investigation was made, by what agency, and where any investigative case file is located. The index

Keep Freedom in Your Future With U.S. Savings Bonds.

CSC FORM 631
NOVEMBER 1961

is checked whenever an agency begins a personnel investigation in order to avoid duplicating previous investigative efforts. Also, the index is searched to provide prospective employing agencies information on previously investigated job applicants.

Under our present process the size of the file continues to grow, even though the bulk of the cards merely record that a minimal investigation was made with favorable results and no case file was retained. Because of this, we have again reached the point where our rotary file equipment is saturated. We recommend the following steps be taken to reduce the size of the file:

- (1) Remove all cards which indicate no further action has been taken since June 30, 1955. This would include cards showing the existence of an investigative file, flag cards showing removal for serious cause or for medical reasons, or the fact that suitability information is on file in another government agency.
- (2) Remove all cards that show a clear NAC or NACI investigation was conducted and the file destroyed prior to July 1, 1973. The results of these investigations are filed in the Official Personnel Folder. Our experience shows that the greatest use of these cards is made within the two year period following completion. The Federal Bureau of Investigation and the Department of Defense has advised us that they have no objection to this.

The cards that are removed from the file will be boxed and stored at our relocation site in lieu of the duplicate cards already stored there. The duplicates will then be destroyed. In 1980, when the first group of investigative case files are eligible for destruction under the 20 year retention schedule, we will then destroy these index cards.

To eliminate the problem of continued growth to our Security Index File we recommend approval of a 20 year retention period for record cards falling within the first category above. On record cards falling within the second category we recommend a two year retention period.

Actions Recommended

<u>Title</u>	<u>Authorized Disposition</u>
1. Investigative Case Files	Transfer to Federal Records Center 5 years after date of last action. Destroy 15 years after transfer.
2. Security Investigations Index	When an investigative case file is not maintained, destroy 2 years from the date of the last action. Destroy all other cards 20 years after the date of the last action.

Subject: Investigative Case Files, and Purge and
Disposition of Cards from Security Index

ACTION:

#1:

#2:

Agree
Agree
G.H. Dunton
Bernard Rosen
Executive Director 6/20/75

ACTION:

#1:

#2:

OK
Adolsek 6/21/75
L.J. Adolsek
Commissioner

sub: 9 - Conn 6/25/75
Jayne B. Spain
Vice Chairman

147 *W. E. H.* 6/25/75
Robert E. Hampton
Chairman

Exhibit B5

REQUEST FOR AUTHORITY TO DISPOSE OF RECORDS

(See Instructions on Reverse)

TO: GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)

U.S. Civil Service Commission

2. MAJOR SUBDIVISION

Bureau of Management Services

3. MINOR SUBDIVISION

Records Administration Section

4. NAME OF PERSON WITH WHOM TO CONFER

Charles R. Chesak

5. TEL. EXT.

632-4510

6. CERTIFICATE OF AGENCY REPRESENTATIVE:

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of records are not now needed for the business of this agency or will not be needed after the retention periods specified.

7/1/75
Date

Eugene D. Kimmel
Signature of Agency Representative

Chief, Office Services Division
(Title)

7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
1.	<u>Investigative Case Files -</u> Break closed cases annually. Transfer to FARC 5 years after break. Destroy 15 years after transfer.	II-MNA-3152	
2.	<u>Security Investigations Index -</u> When an investigative case file is not maintained, destroy 2 years from the date of the last action. Destroy all other cards 20 years after date of last action.	II-MNA-3152	

CSDA-56

115-306

STANDARD FORM 115
Revised January 1973
Prescribed by General Services
Administration
FORM 115 (GPO 101-114)

LEAVE BLANK	
DATE RECEIVED JUL 1 6 1975	JOB NO. NC-146-76-1
NOTIFICATION TO AGENCY	
In accordance with the provisions of 44 U.S.C. 3302a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "with-drawn" in column 10.	
7-22-75 James P. O'Neil (Date) <i>auth</i> Archivist of the United States	

UNITED STATES OF AMERICA
GENERAL SERVICES ADMINISTRATION

National Archives and Records Service
Washington, DC 20408



July 25, 1975

Mr. Donald J. Biglin, Director
Bureau of Management Services
U.S. Civil Service Commission
Washington, DC 20415

Dear Mr. Biglin:

The enclosed Standard Form 115, (Job Number NC-146-76-1), covering records of your agency has been approved by the Archivist of the United States.

As you are no doubt aware, this is the culmination of many months of hard work on the part of Mr. Charles R. Chesek and Mr. Eugene D. Rummel who have been working with us to secure a shorter retention period for personnel security clearance case files. The reduction of ten years in the length of time that such records must be kept will permit the disposition of a sizable volume of your agency's investigative case files that are now stored in the Washington National Records Center.

We have been advised by the Congress, however, that under the provisions of Senate Resolution 21 records of this nature are not to be destroyed at this time. You should note carefully the final paragraph of the attached information copy of the notification. We will retain these records in our custody until this investigation is completed.

We appreciate your assistance and that of your staff in reducing the retention period for these records. The reduction in space requirements will result in substantial savings for the Federal Government.

Sincerely,

WALTER W. STENDER
Assistant Archivist for
Federal Records Centers

Enclosures

Keep Freedom in Your Future With U.S. Savings Bonds

MIKE MANSFIELD
MONTANA

United States Senate
Office of the Majority Leader
Washington, D.C. 20510

February 7, 1975

65 2/4/75
NARS
JMS 2/4/75
R. G. King
R. G. King
REPLY DUE:
APR 16 1975

Honorable Arthur F. Sampson
Administrator
General Services Administration
Washington, D. C. 20405

Dear Mr. Sampson:

As you may be aware, the Senate is to conduct an investigation and study of government operations with respect to intelligence activities. The scope of the investigation is set out in S. Res. 21, a copy of which has been enclosed for your information.

We are writing to request that you not destroy, remove from your possession or control, or otherwise dispose or permit the disposal of any records or documents which might have a bearing on the subjects under investigation, including but not limited to all records or documents pertaining in any way to the matters set out in section 2 of S. Res. 21.

Additionally, we shall appreciate your cooperation in requesting the National Archives and Records Service to be alert to the provisions of the Resolution and not destroy records to which it applies, regardless of their age or the agency from which the destruction request is received.

Sincerely yours,

Hugh Scott
HUGH SCOTT, REPUBLICAN LEADER

Mike Mansfield
MIKE MANSFIELD, MAJORITY LEADER

Enclosure

RECEIVED
FEB 12 1 35 PM '75
U.S. SENATE

Destruction of Investigative Files

AUG 10 1976

Robert J. Drummond, Jr., Director
Bureau of Personnel Investigations

Robert E. Hampton
Chairman

In July 1975 the Archivist of the United States approved the Commission's request to dispose of investigative case files after 20 years. Previously these files were to be maintained for 30 years, but in fact none had ever been destroyed.

At the time of approval of the new destruction schedule, GSA notified us that under provisions of Senate Resolution 21 records of this nature were not to be destroyed at that time. (Attachment 1.) We understand that the select committee established by S.R. 21 has finished its investigation and that some other agencies have been given permission to destroy investigative records in accord with approved destruction schedules.

On May 3, 1976, the Acting Archivist expressed an opinion that records maintained beyond an established retention period - irrespective of the reason - cannot be considered destroyed. (Attachment 2.) This is especially bothersome because many of these older files were removed from our system of records when the Security Investigations Index (SII) card was removed, but are still retrievable by the subject's name and are thus within the purview of the Privacy Act.

The attached letter to Senator Mansfield which asks for relief from Senate Resolution 21 has been cleared through the Office of the General Counsel and the Bureau of Management Services.

INP:JLDurant:dh
8/10/76

1 SEP 02 1976

Honorable Mike Mansfield
United States Senate
Washington, D. C. 20510

Dear Senator Mansfield:

On January 27, 1975, the Senate agreed to Senate Resolution 21 which established a select committee to conduct an investigation and study with respect to intelligence activities carried out by or on behalf of the Federal Government. On February 7, 1975, you and Senator Hugh Scott sent a request to Mr. Arthur P. Sampson, then Administrator of the General Services Administration, that any records or documents which might have a bearing on the subjects under investigation not be destroyed.

The Civil Service Commission conducts investigations under various statutes and executive orders as part of its responsibility for administering the Federal employee loyalty/suitability/security programs and to insure quality staffing in the Federal service. Since the adoption of Senate Resolution 21 we have been accumulating and storing investigative files beyond their useful life and approved retention period.

We understand that the investigation and study work of the select committee is about complete. If there is no further need of the committee for our records we would like to have relief from your request that investigative records not be destroyed.

The maintenance of these files according to the Senate Resolution has impeded substantially the efforts of the Commission to conform its record-keeping practices to the Privacy Act of 1974 (5 U.S.C. 552a). Files that were collected on individuals more than two decades ago, and which no longer serve any useful agency purpose, cannot be destroyed. This, in turn, has frustrated attempts by our Bureau of Personnel Investigations to establish a policy insuring that records maintained are relevant and timely as required by the Act. Furthermore, disposal of the many records we are now holding beyond their authorized retention period will make available a sizable volume of storage space that is needed for storage of active files and records.

Because the Commission is concerned about maintaining obsolete records in violation of the Privacy Act, please let me know if we can now dispose of our investigative files in accordance with our approved destruction schedule. If the select committee perceives a continuing need for these files, we could, as an alternative, transfer physical custody and control to the committee.

Sincerely yours,

Robert E. Hampton
Chairman

INP:JLDurant:dh
8/9/76

Exhibit C1

c1

United States Government
MEMORANDUMOffice of
Personnel ManagementSubject: Approval for Revisions to CSC Administrative
Manual Supplement 44-3 Disposition of RecordsDate: JAN 12 1981
In Reply Refer To:From: Peter Garcia, Deputy Associate Director
Division of Personnel InvestigationsSPF:81-72
Your Reference:To: Ann Brassier, Director
Office of Management

We request your office obtain approval from the General Service Administration, National Archives Records Service, for the Division of Personnel Investigations to use the new disposition instructions for Investigation Records attached.

Please note the changes made in the retention of Investigative Case Files and Security Investigations Index (SII).

Attachment

cc: Richard B. Post

3.14.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. <i>(National Office (DPS))</i> a. ~~Control Office (DPT)~~ <i>Investigations Washington Branch (IWS)</i> b. ~~Washington Division of Investigations (WDI)~~ and RID.	Break closed cards annually. Destroy ~~4~~ years after break. <i>and destroy 1 ~~year~~ 3 ~~years~~ 6 ~~months~~</i> Break closed cards ~~annually~~ . ~~Destroy 6 months after break.~~
5.	Desk Case Control File; card record of pending cases maintained by deadline date in ~~DPT, WDI~~ and RID. <i>DPS, IWS</i>	Destroy when case is closed.
6.	~~Investigations Security Reference File.~~	~~Destroy upon completion of program.~~
7.	~~Loyalty Conversion to FBI and Record of Processing FBI Investigation File (in Form 131, or equivalent).~~	~~Break annually. Destroy 2 years after break.~~
8.	Regional office evaluation reports.	Break annually. Destroy ~~2~~ years after break.
9.	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
10.	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
11.	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of ~~the~~ investigative file, or destroyed if investigative file belongs to another agency.
12.	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
13.	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
14.	~~Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FBI Supplement (Interim) 706-72.~~	~~Break annually. Destroy 2 years after break.~~
15.	~~CPM~~ ~~Form 2799, or equivalent, Daily Report of Investigator.~~	Break quarterly. Destroy no later than one year after break.
16.	Security program workload report.	Break annually. Destroy 1 year after break.
17.	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 4
November 1977

AM Supplement 44-3

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
~~16.15~~ ~~16.~~	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
~~10.~~	~~Relocation File; folders containing duplicate information relating to personnel investigation and adjudications which warrant retention at a relocation site for use in the event of a national emergency.~~	~~Transfer to relocation site when sufficient number available.~~

Exhibit C2

CC: Dob HIERMANN-4/8-81

JUN 1 1981

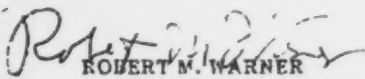
Mr. Donald J. Devine
Director
Office of Personnel Management
1900 E Street, NW
Washington, DC 20415

Dear Mr. Devine:

As a result of testimony of your predecessor, Mr. Alan K. Campbell, before the Senate Committee on the Judiciary on February 9, 1978, a freeze was placed on disposal of some 20,000 cubic feet of Civil Service Commission (CSC) personnel security investigative files, 1928-1950, stored at the Washington National Records Center (WNRC). The records were authorized for disposal when 20 years old pursuant to Disposition Job No. NC1-146-77-1 (item INV-1a), approved by the Archivist on August 1, 1977.

Since that time, we have asked your agency on several occasions to inform us of the resolution of the Committee's request, but have received no response to our inquiries. Instead OPM recently has requested the reduction of the retention period for these same investigative files from 20 to 15 years. I recently approved this request, NC1-146-81-1 (copy attached). The WNRC, however, still is storing 20,000 cubic feet of records which have been eligible for disposal under the old authority since FY 1980. Under the new authority, an additional 6700 cubic feet of records now are eligible for disposal. Prompt disposition of these records is essential in order to alleviate a serious space problem facing the Federal records center system. Because of the urgency of the situation, I have decided therefore to write directly to the Senate Committee about this matter. A copy of our letter is enclosed for your information any assistance, however, your agency can provide will be appreciated.

Sincerely,


ROBERT M. WARNER
Archivist of the United States

Enclosures

cc: N
NN
RCW
NC1-146-81-1

OFFICIAL FILE:NC
DAY FILE:NC
LEAHY:kcd:5-19-81

JUN 1 1981

Honorable Strom Thurmond
Chairman
Committee on the Judiciary
United States Senate
Washington, DC 20510

Dear Senator Thurmond:

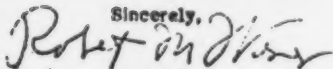
I am writing to ask your concurrence in the immediate disposal of nearly 20,000 cubic feet of CSC personnel security investigative files for the years 1928-1959, stored at the Washington National Records Center (WNRC). Disposal of these records was deferred in accordance with the Judiciary Committee's letter of March 1, 1978, to Mr. Alan Campbell, Chairman of what then was the U.S. Civil Service Commission (CSC). The Committee's letter asked that the Commission postpone the destruction of "its security files on alleged subversive and disloyal activities... until Congress has had an opportunity to consider the matter and make a finding" (see enclosed copy).

Since 1978, severe shortages of storage space for records have developed at many of our Federal records centers. At times transfers of records from Federal agencies have had to be deferred. This has resulted in higher costs to the Government due to the greater expense of storing records in office space. Your cooperation in disposal of the 20,000 cubic feet of records at WNRC, therefore, would result in the freeing of much-needed space for other agency records.

The CSC files contain investigative information regarding an individual's character, conduct, and behavior in the community where he or she lived, and were compiled to permit determination of suitability and fitness for Federal employment, employment in the Government of the District of Columbia and international organizations, access and security clearances, evaluations of qualifications, loyalty to the U.S., and evaluations of qualifications and suitability for performance of contractual services for the U.S. Government. The records originally were scheduled for disposal when 20 years old pursuant to Disposition Job No. NC1-146-77-1, approved by the Archivist on August 1, 1977. The retention period recently has been reduced to 15 years at the request of OPM (Disposition Job No. NC1-146-81-1, copy enclosed).

we have asked CSC and its successor agency, the Office of Personnel Management (OPM), on several occasions since 1978 to inform us of the resolution of the Judiciary Committee's request, but have received no response to our inquiries. Consequently, we decided to write directly to you about this matter. If you or your staff have any questions, please call George Seaboo, Acting Assistant Archivist for Federal Records Centers, at 724-1814. Your assistance in this matter is appreciated.

Sincerely,



ROBERT M. WARNER
Archivist of the United States

Enclosures

cc: Mr. Donald Devine
Director, Office of Personnel Management

cc: N

cc: NN
NCW

OFFICIAL FILE:NC
DAY FILE:NC
LEAHY:kd5-19-81

RECORDS DISPOSAL AUTHORITY (See Instructions on reverse)

TO GENERAL SERVICES ADMINISTRATION,
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408

1. FROM (AGENCY OR ESTABLISHMENT)
Office of Personnel Management

2. MAJOR SUBDIVISION
Office of Management

3. MINOR SUBDIVISION
Administrative Systems Division

4. NAME OF PERSON WITH WHOM TO CONFER
Charles R. Chesek

5. TEL. EXT.
632-4533

6. CERTIFICATE OF AGENCY REPRESENTATIVE

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of 1 page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified.

☐ A Request for immediate disposal.

☒ B Request for disposal after a specified period of time or request for permanent retention.

C. DATE	D. SIGNATURE OF AGENCY REPRESENTATIVE	E. TITLE
3/26/81	<i>Joseph L. Rind</i>	Chief, Administrative Systems Division

7. ITEM NO.	8. DESCRIPTION OF ITEM (With Inclusive Dates or Retention Periods)	9. SAMPLE OR JOB NO.	10. ACTION TAKEN
	Append the Investigation (INV) portion of our disposition schedule as per attached.	AMS 44-3	

115-107

STANDARD FORM 115
Revised April, 1973
Prescribed by General Services
Administration
FPMR (41 CFR) 101-11.4

LEAVE BLANK	
JOB NO.	NC1-146-81-1
DATE RECEIVED	April 8, 1981
NOTIFICATION TO AGENCY	
In accordance with the provisions of 48 U.S.C. 3303a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "withdrawn" in column 10.	
4-30-81	<i>William W. [Signature]</i> Director, Archives of the United States

APPRAISAL REPORT ON RECORDS DISPOSITION REQUEST

JOB NUMBER

NC1-146-81-1

SECTION I - ACTION TAKEN

- ☒ 1. APPROVED FOR DISPOSAL: The records described under all items of the schedule, except those that may be listed in blocks 2, 3, and 4 of this section, are disposable because they do not have sufficient value for purposes of historical or other research, functional documentation, or the protection of individual rights to warrant permanent retention by the Federal Government.

GENERAL ACCOUNTING OFFICE CONCURRENCE ☒ IS NOT NECESSARY ☐ IS NECESSARY AND HAS BEEN OBTAINED.

- ☐ 2. APPROVED FOR PERMANENT RETENTION: The records described under the following item or items have been appraised by the National Archives and Records Service (NARS) and are designated for permanent retention by the Federal Government. The agency will enter these records to NARS as specified in the schedule.

- ☐ 3. DISPOSITION NOT APPROVED: The records described under the following item or items are not approved for disposition. See Section III of this form for explanation.

- ☐ 4. WITHDRAWN: The records described under the following item or items have been withdrawn at the request of the agency.

SECTION II - RECOMMENDATION/CONCURRENCES

	TITLE	SIGNATURE	DATE
44-2804-81 APPRAISAL	APPRAISER	Debra Wallace Lecky	4-24-81
	DIRECTOR, RECORDS DISPOSITION DIVISION	Jean K. Fawley, Acting	4/27/81
CON- CURRENCES			

SECTION III - APPRAISER'S COMMENTS

This job revises the section of NC1-146-77-1 which relates to the investigative program at the Office of Personnel Management. Concurrence by NNF is not necessary because the records were previously authorized for disposal.

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
	INVESTIGATIONS This grouping of records consists of documents relating to the Government-wide investigative program. 1. Investigative Case Files. a. Record copies of reports and related papers maintained in the ~~Division of Personnel Investigations (DPI)~~ <i>Division of Personnel Investigations (DPI)</i> b. Copies of reports, related papers, and investigator notes retained in Regional Investigations Division (RID), ~~including Investigations Washington Branch (IWB)~~ (1) Copies of region of origin cases. (2) Copies of participating region cases. (3) Copies of spot checks, personal confidential inquiries, and personal record searches. (4) Copies of political activity, and other special types of investigative cases. c. Bar and Flag Files, excluding medical flags. (1) Record copies of closed cases resulting in debarment or flagging. ~~(2) Regional office copies of closed cases which result in debarment or flagging.~~ 2. National Agency Check and Inquiry Case Files; includes inquiry forms, results of National Agency Checks, and related case papers. a. Files marked "Clear - file retained in ~~caption~~ for destruction" under instructions in FPM Supplement 736-72 (Internal). b. Files marked "File to ~~DPI~~" under instructions in FPM Supplement 736-72 (Internal). 3. Security Investigations Index (SII), ~~central office~~ <i>Investigation Support Branch (ISB)</i> index to personnel investigations.	Break closed cases annually. ~~Transfer to WHRC 5 years after break.~~ Destroy when ~~20~~ ¹⁵ years old. ~~and destroy after 3 months after break.~~ Break closed cases ~~every~~ ^{after} 3 months. ~~and destroy after 3 months after break.~~ Break closed cases ~~every~~ ^{after} 3 months. ~~and destroy after 3 months after break.~~ Break closed cases ~~every~~ ^{after} 3 months. ~~and destroy after 3 months after break.~~ Break closed cases ~~every~~ ^{after} 3 months. Break closed cases annually. ~~Transfer to WHRC 5 years after break.~~ Destroy when ~~20~~ ¹⁵ years old. ~~Break closed cases every 3 months. Destroy 3 months after break.~~ ~~Investigation Support Branch (ISB)~~ ^{after} Break closed cases ~~monthly~~ ^{every 3 months}. ~~Destroy 3 months after break.~~ Break closed cases annually. Transfer to WHRC 5 years after break. Destroy when ~~20~~ ¹⁵ years old. ~~When an investigation file is not maintained, remove from active file. "Investigation Support Branch (ISB)" file for administrative purposes. Remove all other cards from active files 20 years after the date of final action and destroy.~~

3.144.02

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
4.	Investigations Case Control and Locator Files; card index to pending and recently closed investigations. <i>(National Office (DPS))</i> a. ~~Control Office (DPS)~~ <i>Investigations Washington Branch (JWB)</i> b. ~~Washington Division of Investigations (WDI)~~ and RID.	Break closed cards annually. Destroy ~~4~~ years after break. and destroy ~~3~~ months - Break closed cards ~~3~~ months - Destroy ~~6~~ months after break.
5.	Desk Case Control File; card record of pending cases maintained by deadline date in ~~QRT~~ , ~~WRT~~ and RID. <i>DPS, JWB</i>	Destroy when case is closed.
X.	~~Investigations Security Reference File.~~	~~Destroy upon completion of program.~~
1.	~~Loyalty Connection to FBI and Record of Processing FBI Investigation File (in Form 13), or equivalent.~~	~~Break annually. Destroy 2 years after break.~~
11.	Regional office evaluation reports.	Break annually. Destroy ~~2~~ ³ years after break.
12.	Reimbursable Investigations Lead File (Scheduling); index to private firms that maintain personnel records.	Destroy cards when obsolete or superseded.
13.	Receipt document for completed investigation reports.	Break annually. Destroy 1 year after break.
14.	Security Adjudication File; card file containing time control reports of agency actions on personnel investigations.	Control card destroyed upon receipt of action card. Action card made part of ~~case~~ investigative file, or destroyed if investigative file belongs to another agency.
15.	Adjudication Index; card index to cases pending investigation or adjudication of suitability and security matters and closed cases with a brief statement on closing action.	Break closed cards annually. Destroy 1 year after break.
16.	Case papers relating to the investigation or adjudication of suitability and security matters which do not warrant the establishment of an Investigative File.	Break annually. Destroy 1 year after break.
17.	~~Regional Office Temporary File on special suitability determination cases established in accordance with instructions contained in FBI Supplement (Interim) #96-22.~~	~~Break annually. Destroy 2 years after break.~~
18.	~~CPM~~ ~~Form 2799, or equivalent, Daily Report of Investigator.~~	Break quarterly. Destroy no later than one year after break.
19.	Security program workload report.	Break annually. Destroy 1 year after break.
20.	Appraisal reports of agency security investigation programs.	Place in inactive file on receipt of succeeding report. Break inactive file annually. Destroy 10 years after break. If there is no succeeding report, destroy 10 years from date of report.

Inst. 1
November 1952

AM Supplement 44-3

44-3886-100

ITEM NO.	TITLE AND DESCRIPTION OF RECORDS	DISPOSITION
10-15	Copies of correspondence generated in connection with loyalty conversions and agency determinations made in connection with personnel investigations.	Break annually. Destroy 1 year after break.
10-16	~~Relocation File, folders containing duplicate information relating to personnel investigation and adjudications which warrant retention at a relocation site for use in the event of a national emergency.~~	~~Transfer to relocation site when sufficient number available.~~

AM Supplement 44-3

Inst. 4

November 1947
March 1948

U.S. SENATE,
COMMITTEE ON THE JUDICIARY,
Washington, D.C., March 1, 1978.

Hon. ALAN K. CAMPBELL,
*Chairman, U.S. Civil Service Commission,
Washington, D.C.*

DEAR COMMISSIONER CAMPBELL: Thank you for your appearance before the Senate Subcommittee on Criminal Laws and Procedures on February 9, 1978. Your testimony concerning the impact that the erosion of law enforcement intelligence has had on your ability to implement the Federal Employee Security Program was helpful to our understanding of the problem.

In all frankness, we were profoundly disturbed by some of the answers which you and Mr. Drummond gave in the course of your testimony.

A very serious question is raised by your statement that "most law enforcement officials personally would like to cooperate with us", but because of confusion resulting from different interpretations of LEAA regulations, Privacy Act provisions and state laws, they play it safe by declining to release information. If you can't get information from local law enforcement agencies, it becomes abundantly clear that your ability to do meaningful background checks is virtually non-existent.

Although the primary focus of our recent hearing was on the impact that the erosion of law enforcement intelligence has had on the public security, we were particularly disturbed by what emerged concerning the entire state of our Federal Loyalty-Security Program.

You were asked whether loyalty to the United States Government was still a condition of Federal employment—and you replied that it was. You next agreed that "The starting point of any intelligence operation relating to personnel security in Federal employment would be the establishment of certain criteria or guidelines." But then you testified that you did not have any such criteria.

Then it emerged that as matters now stand you do not even ask questions of applicants for sensitive positions whether they are or have been members of Communist or Nazi or other totalitarian or violence-prone organizations—that, in the absence of an overt act, mere membership in such organizations would not disqualify a person for Federal employment. In the course of the questioning, we mentioned quite a number of organizations—the American Communist Party; the KKK; the American Nazi Party; the Maoists; the Trotskyists; the Prairie Fire Organizing Committee—which publicly supports the terrorist activities of the Weather Underground; the Puerto Rican Socialist Party—which similarly supports and defends the violence perpetrated by the Puerto Rican terrorists; the Jewish Defense League—which engages, in its own name, in acts of violence; and the Palestine Liberation Organization—whose American affiliates support the terrorist acts perpetrated by its parent organization in other countries. The same answer, apparently, applied to all organizations: In the absence of an overt act, mere membership is not a bar to Federal employment.

On the question of mere membership, Mr. Drummond at one point stated that, if it were discovered that an applicant was a member of the KKK, he probably would not be considered suitable for a job with the Equal Employment Opportunities Commission—although his membership would apparently be no bar to employment in other government positions, even sensitive positions. What Mr. Drummond did not explain was how you could possibly find out that an applicant was a member of the KKK if you cannot ask the applicant or those who know him any questions about mere membership in any organization. Nor did Mr. Drummond offer any example of the kind of employment for which mere members of the many other organizations of the far left and the far right might be found unsuitable.

You also informed the Subcommittee that the Index Card System set up in the forties has been eliminated "by action of the Commission", pursuant to Section (e)(7) of the Privacy Act; and that you have notified GAO that you "will adopt the GAO recommendation to dispose" of the organizational files which still remain in the possession of the Commission.

In the light of this information, I find it difficult to avoid the conclusion that over the past five years or so, without the knowledge of Congress and contrary to statutory requirement and the Commission's own regulations, there has been a progressive dismantling of the Federal Loyalty-Security Program—until today, for all practical purposes, we do not have a Federal Employee Security Program worthy of the name.

Your statements and those of the GAO Report on the contemplated destruction of files are both disturbing and confusing. The GAO Report on page vi said "The Commission has decided to destroy its security files on alleged subversive and disloyal activities." I note that this went somewhat beyond the recommendation of the GAO itself, which simply suggested that the Civil Service Commission "obtain authorization from Congress for the files on alleged subversive and radical organizations, or delete them." Moreover, when you said that "the Index to the Security Research files was eliminated pursuant to Section (e)(7) of the Privacy Act", it was unclear whether they have been physically eliminated or simply locked up, or whether you contemplate their physical elimination.

We ask that you postpone taking any irrevocable action with regard to the files currently in your possession until Congress has had an opportunity to consider the matter and make a finding.

With our thanks for your cooperation in this matter.

Sincerely,

JAMES O. EASTLAND,
Chairman.
STROM THURMOND,
Ranking Minority Member.

HON. STROM THURMOND,
Committee on the Judiciary,
U.S. Senate, Washington, D.C.

DEAR SENATOR THURMOND: The letter of March 1, 1978, from you and Senator Eastland, requests that we postpone taking any action with respect to the index to the Security Research Files and the Files themselves until Congress has had an opportunity to consider the matter and make a finding.

The dismantling and destruction of the index was approved by the Commission in September, 1973, just prior to the effective date of the Privacy Act of 1974. While the index has not been used subsequent to September 27, 1975, it could not be destroyed because of the moratorium on the destruction of records imposed by Senate Resolution 21, of January 27, 1975. This moratorium was lifted on December 21, 1977, and we were preparing to dispose of the index as well as the source material.

In our judgment the index does not meet the standards of relevancy, accuracy, and timeliness required by the Privacy Act of 1974, and its continued use would violate Section (e)(7) which provides that an agency shall maintain no record describing how an individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual about whom the record pertains, or unless pertinent to and within the scope of an authorized law enforcement activity.

The attached decision of the court in *Gang v. U.S. Civil Service Commission* represents the consequences that attach both to the maintenance of untimely information and information pertaining to the exercise of First Amendment rights. Nevertheless, we will not destroy or dispose of the index or source material pending further discussion with your staff.

I would also hope that our respective staffs could discuss the broader issues set forth in your letter to assure a proper understanding of what we interpret as the impact of the Privacy Act of 1974 on the Federal Employee Loyalty/Security Program.

To arrange for further discussion please have someone on your staff contact Robert J. Drummond, Jr., telephone 632-6131.

Sincerely yours,

ALAN K. CAMPBELL,
Chairman.

Enclosure.

LETTER TO THE ARCHIVIST OF THE UNITED STATES CONCERNING SEALING OF
INVESTIGATIVE FILES

ROBERT J. DRUMOND, Jr.,
Director, Bureau of Personnel Investigations.

ROBERT E. HAMPTON,
Chairman.

Thru: RAYMOND JACOBSON,
Executive Director.

The attached letter to the Archivist seeks his concurrence in our treatment of investigative files which have been purged from our Security Investigations Index but not yet destroyed in accordance with the approved destruction schedule. His concurrence in this treatment should strengthen our position if we are challenged in the courts for failure to make such files available under terms of the Privacy Act.

Under the Privacy Act we must make investigative files in our system of records available to the subjects of the investigation upon their request. We are also charged to "maintain no record describing how any individual exercises rights guaranteed by the First Amendment" with certain delineated exceptions.

Many of these older files which have been purged from our active system of records tend to be more voluminous than later files and more susceptible to challenge and request for amendment because of the age and apparent "non-relevance" of the material contained in them. They also tend to contain more information of a questionable nature, vis a vis exercise of First Amendment rights. Thus, release and amendment of these files as well as expurgation of prohibited First Amendment information would tend to be quite costly—all of which can be avoided if these files are considered sealed and thus not subject to the Privacy Act because they are not in our system of records.

I recommend your approval and transmittal of this letter.

Mr. JAMES B. RHOADS,
Archivist of the United States, National Archives and Records Service, General Services Administration, Washington, D.C.

DEAR MR. RHOADS: On July 25, 1975, we were informed that a revised schedule had been approved for retention of our investigative records (Job number NC-146-76-1). At that time we were also reminded of the restrictions of Senate Resolution 21 concerning destruction of such records.

Civil Service Commission investigations files established before 1960 were indexed and stored alphabetically without regard to the year in which established. Investigative files established since then have been numbered serially, generally with a new number sequence each year. These numbered files are indexed alphabetically but stored numerically.

Shortly after approval of the revised destruction schedule, we purged the Security Investigations Index of all cards showing an investigation for which a file was established but which indicated no further investigative activity had taken place since June 30, 1955. These index cards have been put in archival storage and will be held there until 1980, or later if relief is not granted from Senate Resolution 21, at which time they will be destroyed along with all alphabetical files. In the meantime, those files for which the index cards have been removed from our records system are not pulled, reviewed, or used for any official purpose.

Under the Privacy Act of 1974, we must respond to individuals who request access to files which we maintain on them. These alphabetical files which are no longer indexed in our system are still maintained by us in a technical sense, and could be retrieved by the name of the individual. However, they are being maintained only because it would be administratively infeasible to sort through all the files to purge the ones older than July 1, 1955, and because we are not permitted by Senate Resolution 21 to destroy them.

With your concurrence, we will treat those files which are no longer indexed in our system of records, but are maintained as archival as though they are already destroyed in accordance with our approved schedule when we receive any kind of request for access, either under the Privacy Act or for other official purposes. These files will be considered sealed and inaccessible for any purpose except if required by the United States Senate in connection with a study and investigation of government intelligence operations within the scope of Senate Resolution 21.

We would appreciate an early response regarding your concurrence with our proposed treatment of these files.

Sincerely yours,

ROBERT E. HAMPTON,
Chairman.

ADDITIONAL QUESTIONS TO AND RESPONSES FROM THE FBI

1. Do the individual files, which are the subject of this hearing, have any present utility in the E.O. 104050 personnel security program or any other security/loyalty program presently authorized?
2. Do the FBI files duplicate the files in question? Do the FBI files duplicate the portions of the files in question which pertain to the loyalty of the individual or to whether or not the individual constitutes a national security risk?
3. What would be the number or percent of files that you would recommend be examined in order to ascertain whether these files have historical, national security, or other value sufficient to warrant retention?
4. What would be the number or percent of the files which you would recommend be examined in order to substantiate or verify the claim that the portions of the files which have loyalty or national security value are duplicated by FBI files? What would be a sufficient sample to accomplish this?

5. What would be the position of the FBI with regard to a proposal that the individual files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
6. What would be the position of the FBI with regard to a proposal that the organizational files and its index be turned over to the FBI for its use in its national security/loyalty investigations?
7. Have the individual files or the organizational files ever been offered to the FBI for its use as an alternative to disposal? If so, when was the offer made, by whom was it made, and what was the FBI's response to said offer?

NOV 23 1981



U.S. Department of Justice

Federal Bureau of Investigation

Office of the Director

Washington, D.C. 20535

November 13, 1981

Honorable Jeremiah Denton
Chairman, Subcommittee on Security and Terrorism
Committee on the Judiciary
United States Senate
Washington, D. C. 20510

Dear Mr. Chairman:

Reference is made to your letter dated October 22, 1981, requesting the Federal Bureau of Investigation (FBI) to provide responses to additional questions regarding the disposition of twenty thousand cubic feet of Civil Service Commission (CSC) Personnel Security Investigative files of the period 1928-1959.

Responses to your inquiries, which were prepared by the Records Management Division, are enclosed.

I hope the enclosed information will assist in resolving your concerns in this matter. If I can be of further assistance, please do not hesitate to contact me.

Sincerely yours,

William H. Webster
Director

Enclosures(7)

RESPONSE TO QUESTION NO. 1 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 1:

Do the individual files, which are the subject of this hearing, have any present utility in the E.O. 10450 personnel security program or any other security/loyalty program presently authorized?

FBI RESPONSE:

The utility of the Civil Service files which are the subject of the hearing cannot be determined without a detailed review.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 2 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 2:

Do the FBI files duplicate the files in question? Do the FBI files duplicate the portions of the files in question which pertain to the loyalty of the individual or to whether or not the individual constitutes a national security risk?

FBI RESPONSE:

Response to question number 1 is applicable. It would be necessary to examine the material contained in the files which are the subject of the hearing and compare that material with corresponding material that might be contained in FBI files as a result of a referral from the Civil Service Commission.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 3 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 3:

What would be the number or percent of files that you would recommend be examined in order to ascertain whether these files have historical, national security, or other value sufficient to warrant retention?

FBI RESPONSE:

It is believed that an examination of five percent of the files in question would be reasonable and sufficient to determine national security relevance and identify if retention is warranted for other reasons. The FBI defers to National Archives and Records Service regarding appraisal and retention of the Civil Service Commission files to determine if these files warrant retention because of historical significance.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 4 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 4:

What would be the number or percent of the files which you would recommend be examined in order to substantiate or verify the claim that the portions of the files which have loyalty or national security value are duplicated by FBI files? What would be a sufficient sample to accomplish this?

FBI RESPONSE:

It is believed that an examination of a random sampling of five percent (1,000 cubic feet) of these files would be sufficient to verify any duplication of information contained therein.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 5 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 5:

What would be the position of the FBI with regard to a proposal that the individual files and its index be turned over to the FBI for its use in its national security/loyalty investigations?

FBI RESPONSE:

No appreciable benefit would be realized by the FBI taking possession of the Civil Service Commission files and index, inasmuch as information contained in these records is presently available through the Office of Personnel Management. Additionally, the following other considerations mitigate against FBI taking possession of the files and index:

- a. There is no space available at FBI Headquarters to accommodate the storage of these records.
- b. FBI acceptance of these records would be an extremely expensive undertaking, inasmuch as all these records would have to be integrated into the FBI's Central Records System in order to make them compatible with the FBI unique numbering and filing scheme.

- c. Additional FBI personnel would be required to maintain and process these records.
- d. Acceptance of these records would place additional personnel and financial burdens on the FBI relative to processing Freedom of Information and Privacy Act requests, expungements, civil litigation, civil discovery, etc.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 6 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 6:

What would be the position of the FBI with regard to a proposal that the organizational files and its index be turned over to the FBI for its use in its national security/loyalty investigations?

FBI RESPONSE:

Before offering a response to this question, it would first be necessary to examine the organizational files to ascertain whether their content is duplicated in FBI files.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

RESPONSE TO QUESTION NO. 7 FROM THE
SUBCOMMITTEE ON SECURITY AND TERRORISM
GOVERNMENT FILES

Question No. 7:

Have the individual files or the organizational files ever been offered to the FBI for its use as an alternative to disposal? If so, when was the offer made, by whom was it made, and what was the FBI's response to said offer?

FBI RESPONSE:

The files in question have never been offered to the FBI.

Robert P. Finzel
Assistant Director
Records Management Division
Federal Bureau of Investigation

○